UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
(ALEXANDRIA DIVISION)

COACH, INC. and COACH SERVICES, INC., Civil Action No. 11-cv-309

Plaintiffs,

v.

coachhandbags.biz,1941coachoutletstore.com, 2coachoutlet.com, all-coach.com, allofcoach.com, annacoachoutlet.com, bagscoach.com, bagsoutletcoach.com, bestcoachhandbags.com, buycheapcoach.com, buydiscountcoachbag.com, ccoachoutlet.com, cheapcoachbag.com, cheapcoach-bags.com, cheap-coach-bags.com, cheapcoachbags2011.com, cheapcoachbagsoutlet.com, cheapcoachbagssale.com, cheapcoachbagssales.com, cheapcoachbuy.com, cheap-coach-outlet.com, cheap-coach-outlets.com, cheapcoachs.com, cheapcoachstores.com, choosecoachbags.com, classic-coach.com, coach001.com, coach2handbags.com, coach4handbags.com, coachandbagsoutlet.com, coachbag4u.com, coachbagdesign.com, coachbaggifts.com, coachbagol.com, coach-bag-outlet.com, coachbags1941.com, coachbags2011.com, coachbags2sale.com, coach-bags2u.com, coachbags888.com, coachbagsale.com, coachbagsbasic.com, coachbagsdiscount.com, coachbagselling.com, coachbagshome.com, coachbagshop.com, coachbagsnew.com, coachbagsok.com, coachbags-outlet.com, coach-bags-outlet.com, coachbagsoutlet.com, coach-bags-outlets.com, coachbagsplaza.com, coachbagsplaza123.com, coachbagsplaza456.com, coachbagspurse.com, coach-bags-purses.com, coach-bags-sale.com, coachbags-shoppe.com, coachbags-shops.com, coachbagstock.com, coachbag-stores.com, coachbagstrade.com, coachbags-us.com, coachbags-usa.com, coachchanelhandbags.com, coach-cheap.com, coachcheapbags.com, coachcheapoutlet.com, coachcoachcoach.com, coach-diaper-bag.com, coacheapoutlet.com, coachfactoryoutletonline.com, coachfactory-outlets.com, coach-factory-outlets.com, coach-factory-store.com, coach-factory-stores.com, coachfashionshop.com, coachforcheap.com, coachhandbag6.com, coachhandbags1.com, coachhandbags1941.com, coachhandbags7.com, coachhandbagscity.com, coachhandbagscom.com, coachhandbagsell.com, coachhandbagsfactory.com, coachhandbagshoppe.com, coachhandbags-outlet.com, coachhandbagspurse.com, coachhandbagsshoppe.com, coachhandbags-usa.com, coachnewarrival.com, coachonline-sale.com, coach-online-store.com, coachonlinestores.com, coachopen.com, coachor.com, coachotsale.com, coachoutlet100.com, coachoutlet4sale.com, coachoutletbags.com, coach-outlet-bags.com, coachoutletbuy.com, coachoutletclub.com, coachoutletcom.com, coachoutletdirect.com, coachoutletdiscount.com, coachoutlet-discount.com, coachoutlete.com, coachoutlet-factory.com, coach-outlet-factory.com, coachoutletforsale.com, coachoutlethome.com, coachoutlethot.com, coachoutletkey.com, coachoutletlinebags.com, coachoutletnew.com, coachoutletoffer.com, coach-outletonline.com, coachoutletonlinestore.com, coachoutletpoppy.com, ecoach-stores.com, coach-outlet-purses.com, coachoutletretail.com, , coachoutletsales.com, coachoutletsell.com, coach-outlets-factory.com, coachoutletshop.com, coach-outletshop.com, coachoutletshopping.com, coach-outletstore.com, coach-outletstores.com, coachoutletstoresonline.com, coachoutletstores-usa.com, coachoutletstore-usa.com, coachoutletsusa.com, coachoutlet-us.com, coachoutletusa.com, coachoutlet-vip.com, coachoutletvip.com, coachpoppybags.com, coachpursehandbags.com, coachpursesforcheap.com; coach-pursesoutlet.com, coachpurses-outlet.com, coach-purses-outlet.com, coachpursesoutlet.com, coachpursesworld.com, coachretails.com, coach--outlet.com, coachsalebags.com, coachsaler.com, coachsbags.com, coachshandbags.com, coachshop711.com, coachshophome.com, coachshopsale.com, coachshop-us.com, coachsneakersonsale.com, coachsoutlet.com, coachsoutlet-shop.com, coachsoutlets-online.com, coachstoreoutlets.com, coachstoresale.com, coach-style.com, coachtoshop.com, coach-totes-bags.com, coachusabags.com, coachusamall.com, coolcoachhandbags.com, discountcoachhandbag.com, discountcoach-outlet.com, discount-coach-outlet-store.com,discountcoach-store.com, discountscoach.com, docoach.com, ecoachstore.com, e-coachstore.com, factorycoachoutlets.com, fashioncoachoutlet.com, gogocoach.com, coachfanstore.com, goodcoachbag.com, goodcoachbags.com, goodcoachoutlet.com, hello-coach.com, hotcoachbag.com, hotcoachoutlet.com, icoachoutlets.com, lovecoachbag.com, lovecoachbags.com, luxicoachhandbag.com, luxurycoachbag.com, lvcoachoutlet.com, mycoachoutlets.com, newbagscoach.com, newscoachoutlet.com, nicecoachhandbags.com, offercoachbags.com, officialcoachoutlet.com, okcoachbags.com, oncoachpurses.com, ourcoachbags.com, outlet-coach.com, outlets-coachoutlet.com, pickcoachbags.com, salecoachbag.com, shopcoachbags.com, shoppingcoachhandbags.com, topcoachhandbags.com, top-coachhandbags.com, topcoachoutlet.com, topcoachshop.com, ukcoachhandbags.com, usacoachoutlet.com, usa-coachoutlet.com, usa-coach-outlet.com, usacoachoutletstore.com, us-buycoach.com, uscoachbags1941.com, uscoachbagssale.com, us-coachhandbags.com, uscoachoutlet.com, uscoachpurses.com, us-coachpursesoutlet.com, uscoachsales.com, us-coachstore.com, us-fashioncoach.com, voguecoachbags.com, wholesale-coach.com, yescoachbag.com, buy-coach-handbags.com, lvcoach.com, coach-accessories.com, 2010coachoutlet.com, 2010coachoutletbag.com, coach2010outlet.com, coachnewbags.com, discount-coachhandbags.com, fashioncoachbag.com, handbags4coach.com, newcoachoutletstore.com, stylishcoachbag.com, coachhandbagsmall.com, coachlvhandbags.com, coach-online-outlets.com, coachoutlet2.com, coachoutlets2.com, coachoutletfactorys.com, coachoutletnews.com, coachoutlet-outlet.com, coachoutlets3.com, coachoutletss.com, ecoachshop.com, icoachhandbagsbags.com, ladycoachbags.com, newcoachoutlet.com, online-coach-outlet.com, outlet-coach-handbags.com, replica-coach-bags.com, replicacoachoutlet.com, replicacoachsunglasses.com, salecheapcoach.com, uscoachfactory.com, uscoachoutlets1941.com, womencoachhandbags.com, coachdayss.com, coachbagsnews.com, coachsaleshops.com, coach-sunglass.com, coachhandbags-sale.com, coachoutletshoppe.com, usacoachoutlets.com, uscoachbag.com, us-coachoutlet.com,uscoachpurses.com, us-coachpursesoutlet.com, pickcoachhandbags.com, coachusale.com, coachbagsdiscounts.com, Coach1946.com, coach-outlet-discount.com, Nicecoachbags.com, yourcoachbags.com, Wholesalecoachs.com, coach222.com, coachbaglist.com, coachbagsdigg.com, coachbrandbag.com, coachhandbagoutlets.com, coachhandbags4outlet.com, coachhandbagshop.com, coachhandbagshotsale.com, stylishcoachbag.com, coachhandbagcom.com, coachhandbagsmart.com, coachhandbags-sale.com, coachhandbagsshop.com, coachhandbagstrade.com, and coachbagss1941.com, coachfactoryoutlet.net, coachfactoryoutlets.net, uscoachoutlet.net, uscoachoutlets.net, coachoutlet-2011.net, handbag-coach.net, uscoachoutlet.net, uscoachoutlets.net, usacoachoutlets.net, usacoachoutlet.net, icoachonlineoutlet.net, coach-handbags-outlet.net, coachusoutlet.net, coachpursesstore.net, coach-outletstore-online.net, coachoutlet-factory.net, coachoutletdiscount.net, coachoutlet-discount.net, coachoutlet2011.net, coachoutlet-discount.net, coachonsale.net, coach-handbagshop.net, coach-factory-stores.net, coachbagsstore.net, coachbagsoutlets.net, coachandbag.net, cheap-coach-handbags.net, coachoutletsonlines.net, coachoutletusa.net, coach-outlet-vip.net, replicacoachoutlet.net, Coachoutlethandbags.net, icoachoutlet.net, coachoutletlinebags.net, coach-bag.org, coachbagsoutlet.org, coachbagsoutlets.org, coachfactoryoutlets.org, coach-factory-outlets.org, coachoutlet4u.org, coachoutletcanada.org, coachoutlete.org, coachoutletfactory.org, coachoutletonline.org, coach-outlets.org, coachoutletshoppe.org, coachoutlet-store.org, coachoutlet-stores.org, coachoutlet-us.org, coachoutletvip.org, coachboots.org, uscoachoutlet.org, coachoutletsonline.org, coach-handbag.org, thecoachoutlet.org, uscoachoutlet.org, Coach-outletstoreonline.org, topcoachoutlet.org, cheapcoach.us, cheapcoachbags.us, coach-bags-outlet.us, coachcouponsoutlet.us, coachhandbagoutlet.us, coachhandbags.us, coachhandbags-outlet.us, coachonline.us, coachoutlets.us, coachoutletsonline.us, coachoutletstores.us, coachpurseoutlet.us, coach-purses.us, coachpursesonsale.us, coachretail.us, and coachonlineoutlet.us,

Defendants.

SECOND AMENDED COMPLAINT FOR IN REM INJUNCTIVE RELIEF

Now come Plaintiffs, Coach, Inc. and Coach Services, Inc. (collectively “Coach”), and allege as follows in support of their *in rem* claim against the Internet Domain Names coachhandbags.biz,1941coachoutletstore.com, 2coachoutlet.com, all-coach.com, allofcoach.com, annacoachoutlet.com, bagscoach.com, bagsoutletcoach.com, bestcoachhandbags.com, buycheapcoach.com, buydiscountcoachbag.com, ccoachoutlet.com, cheapcoachbag.com, cheapcoach-bags.com, cheap-coach-bags.com, cheapcoachbags2011.com, cheapcoachbagsoutlet.com, cheapcoachbagssale.com, cheapcoachbagssales.com, cheapcoachbuy.com, cheap-coach-outlet.com, cheap-coach-outlets.com, cheapcoachs.com, cheapcoachstores.com, choosecoachbags.com, classic-coach.com, coach001.com, coach2handbags.com, coach4handbags.com, coachandbagsoutlet.com, coachbag4u.com, coachbagdesign.com, coachbaggifts.com, coachbagol.com, coach-bag-outlet.com, coachbags1941.com, coachbags2011.com, coachbags2sale.com, coach-bags2u.com, coachbags888.com, coachbagsale.com, coachbagsbasic.com, coachbagsdiscount.com, coachbagselling.com, coachbagshome.com, coachbagshop.com, coachbagsnew.com, coachbagsok.com, coachbags-outlet.com, coach-bags-outlet.com, coachbagsoutlet.com, coach-bags-outlets.com, coachbagsplaza.com, coachbagsplaza123.com, coachbagsplaza456.com, coachbagspurse.com, coach-bags-purses.com, coach-bags-sale.com, coachbags-shoppe.com, coachbags-shops.com, coachbagstock.com, coachbag-stores.com, coachbagstrade.com, coachbags-us.com, coachbags-usa.com, coachchanelhandbags.com, coach-cheap.com, coachcheapbags.com, coachcheapoutlet.com, coachcoachcoach.com, coach-diaper-bag.com, coacheapoutlet.com, coachfactoryoutletonline.com, coachfactory-outlets.com, coach-factory-outlets.com, coach-factory-store.com, coach-factory-stores.com, coachfashionshop.com, coachforcheap.com, coachhandbag6.com, coachhandbags1.com, coachhandbags1941.com, coachhandbags7.com, coachhandbagscity.com, coachhandbagscom.com, coachhandbagsell.com, coachhandbagsfactory.com, coachhandbagshoppe.com, coachhandbags-outlet.com, coachhandbagspurse.com, coachhandbagsshoppe.com, coachhandbags-usa.com, coachnewarrival.com, coachonline-sale.com, coach-online-store.com, coachonlinestores.com, coachopen.com, coachor.com, coachotsale.com, coachoutlet100.com, coachoutlet4sale.com, coachoutletbags.com, coach-outlet-bags.com, coachoutletbuy.com, coachoutletclub.com, coachoutletcom.com, coachoutletdirect.com, coachoutletdiscount.com, coachoutlet-discount.com, coachoutlete.com, coachoutlet-factory.com, coach-outlet-factory.com, coachoutletforsale.com, coachoutlethome.com, coachoutlethot.com, coachoutletkey.com, coachoutletlinebags.com, coachoutletnew.com, coachoutletoffer.com, coach-outletonline.com, coachoutletonlinestore.com, coachoutletpoppy.com, ecoach-stores.com, coach-outlet-purses.com, coachoutletretail.com, , coachoutletsales.com, coachoutletsell.com, coach-outlets-factory.com, coachoutletshop.com, coach-outletshop.com, coachoutletshopping.com, coach-outletstore.com, coach-outletstores.com, coachoutletstoresonline.com, coachoutletstores-usa.com, coachoutletstore-usa.com, coachoutletsusa.com, coachoutlet-us.com, coachoutletusa.com, coachoutlet-vip.com, coachoutletvip.com, coachpoppybags.com, coachpursehandbags.com, coachpursesforcheap.comcoach-pursesoutlet.com, coachpurses-outlet.com, coach-purses-outlet.com, coachpursesoutlet.com, coachpursesworld.com, coachretails.com, coach--outlet.com, coachsalebags.com, coachsaler.com, coachsbags.com, coachshandbags.com, coachshop711.com, coachshophome.com, coachshopsale.com, coachshop-us.com, coachsneakersonsale.com, coachsoutlet.com, coachsoutlet-shop.com, coachsoutlets-online.com, coachstoreoutlets.com, coachstoresale.com, coach-style.com, coachtoshop.com, coach-totes-bags.com, coachusabags.com, coachusamall.com, coolcoachhandbags.com, discountcoachhandbag.com, discountcoach-outlet.com, discount-coach-outlet-store.com,discountcoach-store.com, discountscoach.com, docoach.com, ecoachstore.com, e-coachstore.com, factorycoachoutlets.com, fashioncoachoutlet.com, gogocoach.com, coachfanstore.com, goodcoachbag.com, goodcoachbags.com, goodcoachoutlet.com, hello-coach.com, hotcoachbag.com, hotcoachoutlet.com, icoachoutlets.com, lovecoachbag.com, lovecoachbags.com, luxicoachhandbag.com, luxurycoachbag.com, lvcoachoutlet.com, mycoachoutlets.com, newbagscoach.com, newscoachoutlet.com, nicecoachhandbags.com, offercoachbags.com, officialcoachoutlet.com, okcoachbags.com, oncoachpurses.com, ourcoachbags.com, outlet-coach.com, outlets-coachoutlet.com, pickcoachbags.com, salecoachbag.com, shopcoachbags.com, shoppingcoachhandbags.com, topcoachhandbags.com, top-coachhandbags.com, topcoachoutlet.com, topcoachshop.com, ukcoachhandbags.com, usacoachoutlet.com, usa-coachoutlet.com, usa-coach-outlet.com, usacoachoutletstore.com, us-buycoach.com, uscoachbags1941.com, uscoachbagssale.com, us-coachhandbags.com, uscoachoutlet.com, uscoachpurses.com, us-coachpursesoutlet.com, uscoachsales.com, us-coachstore.com, us-fashioncoach.com, voguecoachbags.com, wholesale-coach.com, yescoachbag.com, buy-coach-handbags.com, lvcoach.com, coach-accessories.com, 2010coachoutlet.com, 2010coachoutletbag.com, coach2010outlet.com, coachnewbags.com, discount-coachhandbags.com, fashioncoachbag.com, handbags4coach.com, newcoachoutletstore.com, stylishcoachbag.com, coachhandbagsmall.com, coachlvhandbags.com, coach-online-outlets.com, coachoutlet2.com, coachoutlets2.com, coachoutletfactorys.com, coachoutletnews.com, coachoutlet-outlet.com, coachoutlets3.com, coachoutletss.com, ecoachshop.com, icoachhandbagsbags.com, ladycoachbags.com, newcoachoutlet.com, online-coach-outlet.com, outlet-coach-handbags.com, replica-coach-bags.com, replicacoachoutlet.com, replicacoachsunglasses.com, salecheapcoach.com, uscoachfactory.com, uscoachoutlets1941.com, womencoachhandbags.com, coachdayss.com, coachbagsnews.com, coachsaleshops.com, coach-sunglass.com, coachhandbags-sale.com, coachoutletshoppe.com, usacoachoutlets.com, uscoachbag.com, us-coachoutlet.com,uscoachpurses.com, us-coachpursesoutlet.com, pickcoachhandbags.com, coachusale.com, coachbagsdiscounts.com, Coach1946.com, coach-outlet-discount.com, Nicecoachbags.com, yourcoachbags.com, Wholesalecoachs.com, coach222.com, coachbaglist.com, coachbagsdigg.com, coachbrandbag.com, coachhandbagoutlets.com, coachhandbags4outlet.com, coachhandbagshop.com, coachhandbagshotsale.com, stylishcoachbag.com, coachhandbagcom.com, coachhandbagsmart.com, coachhandbags-sale.com, coachhandbagsshop.com, coachhandbagstrade.com, and coachbagss1941.com, coachfactoryoutlet.net, coachfactoryoutlets.net, uscoachoutlet.net, uscoachoutlets.net, coachoutlet-2011.net, handbag-coach.net, uscoachoutlet.net, uscoachoutlets.net, usacoachoutlets.net, usacoachoutlet.net, icoachonlineoutlet.net, coach-handbags-outlet.net, coachusoutlet.net, coachpursesstore.net, coach-outletstore-online.net, coachoutlet-factory.net, coachoutletdiscount.net, coachoutlet-discount.net, coachoutlet2011.net, coachoutlet-discount.net, coachonsale.net, coach-handbagshop.net, coach-factory-stores.net, coachbagsstore.net, coachbagsoutlets.net, coachandbag.net, cheap-coach-handbags.net, coachoutletsonlines.net, coachoutletusa.net, coach-outlet-vip.net, replicacoachoutlet.net, Coachoutlethandbags.net, icoachoutlet.net, coachoutletlinebags.net, coach-bag.org, coachbagsoutlet.org, coachbagsoutlets.org, coachfactoryoutlets.org, coach-factory-outlets.org, coachoutlet4u.org, coachoutletcanada.org, coachoutlete.org, coachoutletfactory.org, coachoutletonline.org, coach-outlets.org, coachoutletshoppe.org, coachoutlet-store.org, coachoutlet-stores.org, coachoutlet-us.org, coachoutletvip.org, coachboots.org, uscoachoutlet.org, coachoutletsonline.org, coach-handbag.org, thecoachoutlet.org, uscoachoutlet.org, Coach-outletstoreonline.org, topcoachoutlet.org, cheapcoach.us, cheapcoachbags.us, coach-bags-outlet.us, coachcouponsoutlet.us, coachhandbagoutlet.us, coachhandbags.us, coachhandbags-outlet.us, coachonline.us, coachoutlets.us, coachoutletsonline.us, coachoutletstores.us, coachpurseoutlet.us, coach-purses.us, coachpursesonsale.us, coachretail.us, and coachonlineoutlet.us (collectively, the "Infringing Domain Name ("IDN") Defendants").[1]

I. JURISDICTION AND VENUE

1. Subject matter jurisdiction is appropriate in this matter pursuant to 28 U.S.C. §§ 1331 and 1338.

2. This Court has *in rem* jurisdiction over the IDN Defendants pursuant to 15 U.S.C. §1125(d)(2)(A)(ii)(II).

3. This Court has *in rem* jurisdiction over the IDN Defendants: pursuant to 15 U.S.C. §1125(d)(2)(A)(ii)(I) because Coach cannot obtain *in personam* jurisdiction over their

[1] Plaintiff's First Amended Complaint named 418 defendants. The instant Second Amended Complaint names 360 defendants.

registrants, who are located outside of the United States and not subject to personal jurisdiction in the United States. *In rem* jurisdiction is also appropriate due the fact that despite Coach's due diligence, Coach was unable to locate a person who would have been a defendant in a civil action under 15 U.S.C. §1125(d)(1) and has sent notice to the registrants of the IDN Defendants, pursuant to 15 U.S.C. §1125(d)(2)(A)(ii)(II)(aa). Coach will promptly publish the notice of the action after filing, should the Court so direct, pursuant to 15 U.S.C. §1125(d)(2)(A)(ii)(II)(bb). *In rem* jurisdiction is proper in this district pursuant to 15 U.S.C. §1125(d)(2)(C)(i) because the domain name registries for the IDN Defendants - VeriSign, Inc. ("VeriSign"), the Public Interest Registry ("PIR"), and Neustar, Inc. ("Neustar") - are located in this judicial district. Documents establishing control and authority regarding the disposition of the registration of the IDN Defendants shall be deposited with the Court.

4. Venue is proper in this judicial district pursuant to 28 U.S.C. §1391(b)(2) and 15 U.S.C. §§1125(d)(2)(A) and (C).

II. INTRODUCTION

5. Coach brings this action in order to prevent the unlawful and wrongful use of domain names - "cybersquatting" - that incorporate and otherwise depict Coach's exclusive trademarks. The IDN Defendants intend to trade upon Coach's reputation as a luxury goods retailer and upon the goodwill that Coach has developed in the marketplace in order to sell and/or offer for sale unlicensed and counterfeit products featuring Coach's famous trademarks. In doing so, the IDN Defendants have and will continue to cause irreparable harm to Coach through consumer confusion, dilution and tarnishment of Coach's valuable trademarks.

6. Coach brings this suit against all of the IDN Defendants in the interest of judicial economy, and to secure a just, speedy, and economical – both for the Court and the litigants – determination of the action. This suit will not prejudice any the IDN Defendants nor will it result in needless delay.

7. Coach seeks an injunction enjoining the current operators of the IDN Defendants from continuing their use of Coach's trademarks and an order transferring the IDN Defendants to Coach.

III. THE PARTIES

8. Plaintiff Coach, Inc. is a corporation duly organized and existing under the laws of the State of Maryland, with its principal place of business in New York, New York.

9. Plaintiff Coach Services, Inc. is a corporation duly organized and existing under the laws of the State of Maryland, with its principal place of business in Jacksonville, Florida.

10. The IDN Defendants are comprised of the following sub-groups: (1) "Shanghai Group;" (2) "Guangdong Group;" (3) "Foreignness Group;" (4) "United States Group;" (5) "Fujian Group;" (6) "Hong Kong Group;" (7) "Zhengzhou Group;" (8) "Beijing Group;" (9) "173916647@qq.com Group;" (10) "@123 Group;" and (11) "@qq.com Group."

11. The Shanghai Group is defined and described as those infringing domain names whose registrants are, upon information and belief, the same individual or organization as evidenced by their use of fictitious addresses which all include the name "Shanghai" in some context of their postal address. Although the registrant's names are different, each listed address and/or registrant name is, upon information and belief, fictitious based on the "return to sender" notices that Coach received in response to its attempts to reach the listed registrants by postal mail. [*See* Declaration of Donald A. Cole ("Cole Dec.").] The Shanghai Group's interconnectedness is further evidenced by the similarities of the infringing domain names, and the appearance and composition of the sites (*compare, e.g.,* coachhandbagsmail.com *with* coachhandbagshotsale.com, coachhandbagoutlets.com, *and* coachhandbag6.com). The Shanghai Group is comprised of the following infringing domain names:

a. Upon information and belief, the domain name 1941coachoutletstore.com is registered to Zhang Zhi, Shanghai Road, Henan Cn 526666, zzzcxq@msn.com. The domain name registry for 1941coachoutletstore.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for 1941coachoutletstore.com is Xin Net Technology Corporation.

b. Upon information and belief, the domain name coach-bags-purses.com is registered to Flora Gate, Shanghailu, Shanghai China, beyongxm@gmail.com. The domain name registry for coach-bags-purses.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for coach-bags-purses.com is Fastdomain, Inc.

c. Upon information and belief, the domain name coachhandbag6.com is registered to Zhang Jinhua, No. 990 Changning Rd., Shanghai 20061, kairi8898@163.com.

The domain name registry for coachhandbag6.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for coachhandbag6.com is Hichina Zhicheng Technology Ltd.

d. Upon information and belief, the domain name coachoutletbuy.com is registered to Chen Yuxuan, No. 6 405 Jinjishan Wenquan Huayuan, He Road, Shanghai 200085, China, usoakleyshop@yahoo.cn. The domain name registry for coachoutletbuy.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for coachoutletbuy.com is Bizcn.Com, Inc.

e. Upon information and belief, the domain name coachoutlet-factory.com is registered to Lin Xiao Yi, No 908 Fuzhou Road, Shanghai, 200000 China, coachoutlet123@126.com. The domain name registry for coachoutlet-factory.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for coachoutlet-factory.com is Bizcn.Com, Inc.

f. Upon information and belief, the domain name uscoachoutlet.com is registered to Kouqu Lin, Shanghaishiputdongquputdonglulhao, Shanghai, Shanghai 210010 China, onlyregdomain@gmail.com. The domain name registry for uscoachoutlet.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for uscoachoutlet.com is Xiamen Ename Network Technology Corporation Limited DBA Ename Corp.

g. Upon information and belief, the domain name uscoachsales.com is registered to Jiangxiumei, Xu Huiqu Guang Yuan Xi Lu 53 Hao, Shanghai 200030 SH, China, co2n3dsfs33333o@gmail.com. The domain name registry for uscoachsales.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for uscoachsales.com is Beijing Innovative Linkage Technology Ltd.

h. Upon information and belief, the domain name coachhandbagsmall.com is registered to Ling Dong, #1109pingwang Rd Pudong District, Shanghai, Shanghai 200135 China, 25063324@qq.com. The domain name registry for coachhandbagsmall.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for coachhandbagsmall.com is Beijing Innovative Linkage Technology Ltd.

i. Upon information and belief, the domain name coachhandbagshotsale.com is registered to Deren Chen, 13145 Street, Western Road, Pudong District, Shanghai 200120, coachhandbagshotsale@hotmail.com. The domain name registry for coachhandbagshotsale.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for coachhandbagshotsale.com is Bizcn.Com, Inc.

j. Upon information and belief, the domain name coachhandbagoutlets.com is registered to Kobe Lee, Shanghai Rd 888 Suite 778, Shanghai, Shanghai 210010 China, zfaaazf@163.com. The domain name registry for coachhandbagoutlets.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for coachhandbagoutlets.com is Bizcn.Com, Inc.

k. Upon information and belief, the domain name ourcoachbags.com is registered to Liu Dan, Shanghai North Cai, Shanghai 201600CN, 7852524881@qq.com. The domain name registry for ourcoachbags.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for ourcoachbags.com is Bizcn.Com, Inc.

l. Upon information and belief, the domain name outlets-coachoutlet.com is registered to D Shanghai 458715, 52484441@gmail.com. The domain name registry for outlets-coachoutlet.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for outlets-coachoutlet.com is Bizcn.Com, Inc.

12. The Guangdong Group is defined and described as those infringing domain names whose registrants are, upon information and belief, the same individual or organization as evidenced by their use of fictitious addresses which all include some variation of the name

"Guangdong" as their postal address. Although certain of the registrant's names are different, each listed address and/or registrant name is, upon information and belief, fictitious based on the "return to sender" notices that Coach has received in response to its attempts to reach the listed registrants by postal mail. [*See* Cole Dec.] Guangdong is a province on the southern coast of China, further suggesting that the "registrants" of these infringing domain names are related to one another. The Guangdong Group's interconnectedness is further evidenced by the similarities of the infringing domain names, and the appearance and composition of the sites (*compare, e.g.*, coachoutletclub.com *with* coachoutletcom.com, coachoutlete.com, coachoutletshop.com, and coachoutletsusa.com). Moreover, the majority of the registrant email addresses use the term "coach" as an identifier, which is fairly unique to the Guangdong Group. The Guangdong Group is comprised of the following infringing domain names:

a. Upon information and belief, the domain name annacoachoutlet.com is registered to Xu Ning, No.78 North People Road, GuangDong, 523000 China, hb.shoes@126.com. The domain name registry for annacoachoutlet.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for annacoachoutlet.com is Beijing Innovative Linkage Technology Ltd.

b. Upon information and belief, the domain name bagsoutletcoach.com is registered to Jingrong Wu, Feixing rd.12, Guangzhou Guangdong, 560000, CN, imininetb88@126.com. The domain name registry for bagsoutletcoach.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for bagsoutletcoach.com is Name.Com LLC.

c. Upon information and belief, the domain name coachbags2011.com is registered to Ma Hua, Guangzhoubaiyun015hao, Guang Dong Guangdonz CN 123444, service@coachbags2011.com. The domain name registry for coachbags2011.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for coachbags2011.com is Xin Net Technology Corporation.

d. Upon information and belief, the domain name coachbagsdiscount.com is registered to Cheng Dong, Zhongshan Tianhe Guangzhou, Guangzhou, Guangdong, 510405 China, tradenetok@gmail.com. The domain name registry for coachbagsdiscount.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for coachbagsdiscount.com is Hichina Zhicheng Technology Ltd.

e. Upon information and belief, the domain name coachbagshome.com is registered to Zhen Chen, 20 No Nanjing, Guangzhou, GD 510258, admin@coachbagshome.com. The domain name registry for coachbagshome.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for coachbagshome.com is Hichina Zhicheng Technology Ltd.

f. Upon information and belief, the domain name coach-bags-sale.com is registered to Coach Bags, Star Street, GuangZhou BJ CN 100000, yxm238@163.com. The domain name registry for coach-bags-sale.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for coach-bags-sale.com is Xin Net Technology Corporation.

g. Upon information and belief, the domain name coachcouponsoutlet.us is registered to Shao Jun Li, Okba Road Liwang District, Guangzhou, West Virginia 87654, sneakerhome2006@gmail.com. The domain name registry for coachcouponsoutlet.us is Neustar, Inc., 21575 Ridgetop Circle, Sterling, Virginia 20166. The domain name registrar for coachcouponsoutlet.us is Godaddy.com, Inc.

h. Upon information and belief, the domain name coachfactoryoutletonline.com is registered to Chen Dong, 201 No Nanjing, Guangzhou, Guangdong, CN 510258, admin@coachfactoryoutletonline.com. The domain name registry for coachfactoryoutletonline.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for coachfactoryoutletonline.com is Xin Net Technology Corporation.

i. Upon information and belief, the domain name coachhandbagsfactory.com is registered to Den Ling, No.90 West of Ren Ming Road, Dong Guang GD 511700

CN, coachfactory@163.com. The domain name registry for coachhandbagsfactory.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for coachhandbagsfactory.com is Bizcn.Com, Inc.

j. Upon information and belief, the domain name coachhandbagspurse.com is registered to Zhen Chen, 201 No Nanjing, Guangzhou 510258 CN, admin@CoachHandbagsPurse.com. The domain name registry for coachhandbagspurse.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for coachhandbagspurse.com is Hichina Zhicheng Technology Ltd.

k. Upon information and belief, the domain name coachoutletclub.com is registered to Keon Ming, Ren Da Ming, Guangzhou No 109, Guangzhoushi, 510304 China, admin@coachoutletclub.com. The domain name registry for coachoutletclub.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for coachoutletclub.com is Hichina Zhicheng Technology Ltd.

l. Upon information and belief, the domain name coachoutletcom.com is registered to Ben Zhu, Guangzhou Onepound Computer Software, Werwe, gz, GD 510510, China, wanbang@34804804.com. The domain name registry for coachoutletcom.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for coachoutletcom.com is Hichina Zhicheng Technology Ltd.

m. Upon information and belief, the domain name coachoutlete.com is registered to Chenfei, Guang Dong Sheng Shan Tou Shi He Xiang Dong, Jiayuguanshi, Gansusheng, China 515000, swhite@coach.com. The domain name registry for coachoutlete.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for coachoutlete.com is Xin Net Technology Corporation.

n. Upon information and belief, the domain name coachoutlet-factory.net is registered to Tian Ling, No. 2223 Fuyu Road, GuangZhou, Guangdong 510000, love9458@126.com. The domain name registry for coachoutlet-factory.net is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for coachoutlet-factory.net is Xin Net Technology Corporation.

o. Upon information and belief, the domain name coachoutlethome.com is registered to Chen Zhi Cheng, Yangjiang Road, Guangzhoushi, Guangzhou, 410866 China, cookkey@yeah.net. The domain name registry for coachoutlethome.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for coachoutlethome.com is Hichina Zhicheng Technology Limited.

p. Upon information and belief, the domain name coachoutletshop.com is registered to Liujun, 55 Yanping Road Shantou Guangzhou, Guangdong, China 211000, chenjun_09_76@gov.com. The domain name registry for coachoutletshop.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for coachoutletshop.com is Xin Net Technology Corporation.

q. Upon information and belief, the domain name coachoutletsusa.com is registered to Zhen Chen, 2019 No Nanjing, Guangzhou, GD 510253 China, admin@coachoutletsusa.com. The domain name registry for coachoutletsusa.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for coachoutletsusa.com is Hichina Zhicheng Technology Ltd.

r. Upon information and belief, the domain name coach-pursesoutlet.com is registered to Zhang Ming, 2019 No Zhongshan, Guangzhou, GD 510253 China, admin@coach-pursesoutlet.com. The domain name registry for coach-pursesoutlet.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for coach-pursesoutlet.com is Hichina Zhicheng Technology Ltd.

s. Upon information and belief, the domain name coachpursesoutlet.com is registered to Zhang Ling, 32 Yuexiu Guangzhou, Gangzhou 510466 China, info@coachpursesoutlet.com. The domain name registry for coachpursesoutlet.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for coachpursesoutlet.com is Hichina Zhicheng Technology Ltd.

t. Upon information and belief, the domain name coachpursesworld.com is registered to Dongjie Zhen, Jiefang Road Tianhe, Guangzhoushi, Guangzhou, 510405 China, fakecoach@126.com. The domain name registry for coachpursesworld.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for coachpursesworld.com is Hichina Zhicheng Technology Ltd.

u. Upon information and belief, the domain name coachshop711.com is registered to Liuhong, No149roadnanjing, Guangzhou, China 361000, chenfeisheng@163.com. The domain name registry for coachshop711.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for coachshop711.com is Xin Net Technology Corporation.

v. Upon information and belief, the domain name coachshop-us.com is registered to Na Li, Dongguan Lu Dajie 2, Guandong Jiangxi 758414, CN, livetopline@gmail.com. The domain name registry for coachshop-us.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for coachshop-us.com is Bizcn.Com, Inc.

w. Upon information and belief, the domain name coachstoreoutlets.com is registered to Linjiaguo, Baoan, Shenshi, Guangdongsheng China 518000, 48373183@qq.com. The domain name registry for coachstoreoutlets.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for coachstoreoutlets.com is Xin Net Technology Corporation.

x. Upon information and belief, the domain name coachusamall.com is registered to Yanyongxing, Guangdon Providence, Huadu City Guangdong 020336 GD CN, 614421999@qq.com. The domain name registry for coachusamall.com is

VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for coachusamall.com is Bejing Innovative Linkage Technology Ltd.

y. Upon information and belief, the domain name coach-handbags-outlet.net is registered to Xiaomeng, Longgangqu, Shenshi, Guangdongsheng, 88166606@qq.com. The domain name registry for coach-handbags-outlet.net is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for coach-handbags-outlet.net is Xin Net Technology Corporation.

z. Upon information and belief, the domain name discountscoach.com is registered to Zhou Kun, Jie Fang Road Guangzhou, Guangzhou Guangdong 450054 CN, tradenetok@gmail.com. The domain name registry for discountscoach.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for discountscoach.com is Hichina Zhicheng Technology Ltd.

aa. Upon information and belief, the domain name hello-coach.com is registered to Chris Lee, Xi Wan RD 1120, Guangzhou, Guangdong 510000, ccchris2010@hotmail.com. The domain name registry for hello-coach.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for hello-coach.com is Godaddy.com, Inc.

bb. Upon information and belief, the domain name hotcoachoutlet.com is registered to FastDomain Inc., Steppon Ctty, Jianfang Road, Guangzhou, China, tradenetok@gmail.com. The domain name registry for hotcoachoutlet.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for hotcoachoutlet.com is Fastdomain,Inc.

cc. Upon information and belief, the domain name lovecoachbag.com is registered to Liujunyan, No222roadnanjing, Guangzhou, Guangdong CN 257000, 343768594@qq.com. The domain name registry for lovecoachbag.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for lovecoachbag.com is Xin Net Technology Corporation.

dd. Upon information and belief, the domain name lovecoachbags.com is registered to Chen Xiao Yu, No. 5009 Zhong San Road, Yue Xiu Qu, Guangzhou 510000, lovecoachs@126.com. The domain name registry for lovecoachbags.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for lovecoachbags.com is Xin Net Technology Corporation.

ee. Upon information and belief, the domain name newscoachoutlet.com is registered to You Fang, 190 no Zhongshan, Guangzhou GD 510217 CN, admin@newscoachoutlet.com. The domain name registry for newscoachoutlet.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for newscoachoutlet.com is Hichina Zhicheng Technology Ltd.

ff. Upon information and belief, the domain name topcoachoutlet.com is registered to Liangliang Ren, Jiefang Road, Guangzhou 510405 GU CHINA, menbiztest@gmail.com. The domain name registry for topcoachoutlet.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for topcoachoutlet.com is Melbourne It, Ltd. D/B/A Internet Names Worldwide.

gg. Upon information and belief, the domain name topcoachshop.com is registered to Huang Yanfei, No. 23 Huping Road, Shantou Guangdong 515041, 343768594@qq.com. The domain name registry for topcoachshop.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for topcoachshop.com is Bizcn.Com,Inc.

hh. Upon information and belief, the domain name us-coachstore.com is registered to Zhang Li, Cheng Zhen Road, Dongguan, Guangdong 223648 China, livetopline@gmail.com. The domain name registry for us-coachstore.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for us-coachstore.com is Bizcn.Com, Inc.

ii. Upon information and belief, the domain name lvcoach.com is registered to liuyan, No1330hexiangli, Guangzhou, Guangdong China 320000, liuyan_123@163.com. The domain name registry for lvcoach.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for lvcoach.com is Xin Net Technology Corporation.

jj. Upon information and belief, the domain name newcoachoutletstore.com is registered to Abdul Koun, Tianyuan Zhong Road, Guangzhou, GD 487738, China, ok@newcoachoutletstoe.com. The domain name registry for newcoachoutletstore.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for newcoachoutletstore.com is Hichina Zhicheng Technology Ltd.

kk. Upon information and belief, the domain name newcoachoutlet.com is registered to Zhang Dong You, Tianhe Building Huangpu Guangzhou, Guangzhoushi, 510405, China, ttokend@126.com. The domain name registry for newcoachoutlet.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for newcoachoutlet.com is currently unknown.

ll. Upon information and belief, the domain name uscoachoutlet.net is registered to Lin Binbin, Shantousi, Guangdong 515041 China, tengteng50@yahoo.com.cn. The domain name registry for uscoachoutlet.net is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for uscoachoutlet.net is Bizcn.Com, Inc.

mm. Upon information and belief, the domain name uscoachoutlets.net is registered to Lin Binbin, Shantousi, Quangdong 515041 China, tengteng50@yahoo.com.cn. The domain name registry for uscoachoutlets.net is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for uscoachoutlets.net is Bizcn.Com, Inc.

nn. Upon information and belief, the domain name coachbagsdiscounts.com is registered to Zhao Dong, 19 No Zhongshan, Guangzhou, GD 510253 China, admin@CoachBagsDiscounts.com. The domain name registry for coachbagsdiscounts.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for coachbagsdiscounts.com is Hichina Zhicheng Technology Ltd.

oo. Upon information and belief, the domain name Coach-outletstoreonline.org is registered to Wang Xiong, Shongshan Road 369fdas, Koasnd As, Guangdong 362013 China, myjanebaby@163.com. The domain name registry for Coach-outletstoreonline.org is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for Coach-outletstoreonline.org is Xin Net Technology Corporation.

pp. Upon information and belief, the domain name coachhandbagstrade.com is registered to handbagsdiy.com, Guangzhoushi Guangdongsheng 510540 China, 62351496@yahoo.com. The domain name registry for coachhandbagstrade.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for coachhandbagstrade.com is Xin Net Technology Corporation.

13. The Foreignness Group is defined and described as those infringing domain names whose registrants are, upon information and belief, the same individual or organization as evidenced by their use of fictitious addresses which all include the term "Foreignness" in their postal address. Although the registrant's names are different, each listed address and/or registrant name is, upon information and belief, fictitious based on the "return to sender" notices that Coach has received in response to its attempts to reach the listed registrants by postal mail. [*See* Cole Dec.] There is no province, city, or other locale known as "Foreignness," further suggesting that the "registrants" of these infringing domain names are related to one another. The Foreignness Group's interconnectedness is further evidenced by the similarities of the infringing domain names and the appearance and composition of the sites (*compare, e.g.*, coach4handbags.com *with* coachbag4u.com, coachbagdesign.com, coachbaggifts.com, and coachbagstock.com). Moreover, each of the infringing domain names in the Foreignness Group use the same registrar, Beijing Innovative Linkage Technology Ltd., evidencing the infringing

domain names' relatedness. The Foreignness Group is comprised of the following infringing domain names:

a. Upon information and belief, the domain name all-coach.com is registered to Rrtyer, Dfghjg, Foreignness 456754 WG CG, sgfdhbre@sina.com. The domain name registry for all-coach.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for all-coach.com is Beijing Innovative Linkage Technology Ltd.

b. Upon information and belief, the domain name coach4handbags.com is registered to shen man, California Yunus is the Municipal Science and Technology Division Street, 112, Foreignness 625141 WG, sales@coach4handbags.com. The domain name registry for coach4handbags.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for coach4handbags.com is Beijing Innovative Linkage Technology Ltd.

c. Upon information and belief, the domain name coachbag4u.com is registered to xiaowei, Los Angeles, 38 Fremont Street, the town of magoffin, Foreignness 90097 WG, sales@coachbag4u.com. The domain name registry for coachbag4u.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for coachbag4u.com is Beijing Innovative Linkage Technology Ltd.

d. Upon information and belief, the domain name coachbagdesign.com is registered to chenpeilin, Atkinson Town, Illinois, Maryland Street, No. 16, Foreignness 90097 WG, sales@coachbagdesign.com. The domain name registry for coachbagdesign.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for coachbagdesign.com is Beijing Innovative Linkage Technology Ltd.

e. Upon information and belief, the domain name coachbaggifts.com is registered to wanghongyan, Waterbury City, Sangdikeli Street, Detroit 39, Foreignness 90097 WG, sales@coachbaggifts.com. The domain name registry for coachbaggifts.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for coachbaggifts.com is Beijing Innovative Linkage Technology Ltd.

f. Upon information and belief, the domain name coachbagol.com is registered to hexiulin, United States, North Carolina State 19 Marshall Street, the town of the Holy Spi, Foreignness 90097 WG, sales@coachbagol.com. The domain name registry for coachbagol.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for coachbagol.com is Beijing Innovative Linkage Technology Ltd.

g. Upon information and belief, the domain name coachbagstock.com is registered to guoxiaojing, Sanford Town, Bay Street, Atlanta, United States 28, foreignness wg 90097, sales@coachbagstock.com. The domain name registry for coachbagstock.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for coachbagstock.com is Beijing Innovative Linkage Technology Ltd.

h. Upon information and belief, the domain name fashioncoachoutlet.com is registered to Halima Abdulbaki, 48 Harvest Hills Dr, Foreignness 56432 WG FJ, kyok@fashioncoachoutlet.com. The domain name registry for fashioncoachoutlet.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for fashioncoachoutlet.com is Beijing Innovative Linkage Technology Ltd.

i. Upon information and belief, the domain name luxicoachhandbag.com is registered to lijiayu, Philadelphia Brookhaven Town, Foreignness 90097 WG US, sales@luxicoachhandbag.com. The domain name registry for luxicoachhandbag.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for luxicoachhandbag.com is Beijing Innovative Linkage Technology Ltd.

j. Upon information and belief, the domain name luxurycoachbag.com is registered to yanwenhuan, The town of St. Paul Street, Philadelphia Foreignness 90097, sales@luxurycoachbag.com. The domain name registry for luxurycoachbag.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for luxurycoachbag.com is Beijing Innovative Linkage Technology Ltd.

k. Upon information and belief, the domain name us-fashioncoach.com is registered to Linxiansheng, Wesfhsdghd, Foreignness 466835, WG IE, 22854530@qq.com. The domain name registry for us-fashioncoach.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for us-fashioncoach.com is Beijing Innovative Linkage Technology Ltd. DBA Dns.Com.Cn.

l. Upon information and belief, the domain name coachtoshop.com is registered to bgfuyj, rtyuiui, Foreignness 45678 WG EG, etrytjh@sina.com. The domain name registry for coachtoshop.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for coachtoshop.com is Bejing Innovative Linkage Technology Ltd.

m. Upon information and belief, the domain name yescoachbag.com is registered to zhangmeina, New York, New York City, Misoprostol Street, Foreignness 90097 WG United States, sales@yescoachbag.com. The domain name registry for yescoachbag.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for yescoachbag.com is Beijing Innovative Linkage Technology Ltd. DBA Dns.Com.Cn.

n. Upon information and belief, the domain name coachbaglist.com is registered to zhangyapeng, The town of Garfield Street, Philadelphia, Foreignness, 90097 United States, sales@coachbaglist.com. The domain name registry for coachbaglist.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for coachbaglist.com is Beijing Innovative Linkage Technology Ltd. DBA Dns.Com.Cn.

o. Upon information and belief, the domain name coachbrandbag.com is registered to linhongtai, The U.S. State of North Carolina, Foreignness, 90097 WG, United States, sales@coachbrandbag.com. The domain name registry for coachbrandbag.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for coachbrandbag.com is Beijing Innovative Linkage Technology Ltd. DBA Dns.Com.Cn.

14. The United States Group is defined and described as those infringing domain names whose registrants are, upon information and belief, the same individual or organization as evidenced by their use of fictitious addresses which all purport to be a postal address within the United States of America. Although the registrant's names are different, each listed address and/or registrant name is, upon information and belief, fictitious based on 1) the "return to sender" notices that Coach has received in response to its attempts to reach the listed registrants by postal mail, and 2) the phone calls from individuals who received the notices and contacted Coach's counsel to notify them that their names and contact information had been used without their knowledge and approval. [*See* Cole Dec.] The United States Group's interconnectedness is further evidenced by the fact that the majority of the IDN Defendants within the group list seemingly legitimate registrant names and postal addresses, but which are, upon information and belief, not the true registrant. Additionally, for the small number of IDN Defendants within the United States Group which list wholly fictitious registrant names, the similarities between those infringing domain names and the infringing domain names with seemingly legitimate registrant names and postal addresses is strikingly similar (*compare, e.g.*, coachbagsplaza.com, whose listed registrant is "Sue Piti," *with* coachbagsplaza123.com and coachbagsplaza456.com, whose listed registrant, respectively, is "ctry client"). The United States Group is comprised of the following infringing domain names

a. Upon information and belief, the domain name cheap-coach-bags.com is registered to Kimberly Collins, 7 Raymonde Circle, Ormond Beach, Florida 32176, dwuppw5922@hotmail.com. The domain name registry for cheap-coach-bags.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for cheap-coach-bags.com is Godaddy.com, Inc.

b. Upon information and belief, the domain name cheapcoachbags2011.com is registered to Diresert Haynes, 327 Peirce Road, Cottageville SC 29435, cheapcoachbags2011@hotmail.com. The domain name registry for cheapcoachbags2011.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for cheapcoachbags2011.com is Hichina Zhicheng Technology Ltd.

c. Upon information and belief, the domain name cheapcoachbuy.com is registered to Maribel Lopez, 525 Hercules Trl Madison, New York, West Virginia 53718, zmjfxcg66@hotmail.com. The domain name registry for cheapcoachbuy.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for cheapcoachbuy.com is Godaddy.com, Inc.

d. Upon information and belief, the domain name cheap-coach-outlet.com is registered to Brewer, Larry, Go Mom Street 119 Patti Drive, Franklin, Ohio 45005, remadicop@gmail.com. The domain name registry for cheap-coach-outlet.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for cheap-coach-outlet.com is Godaddy.com, Inc.

e. Upon information and belief, the domain name choosecoachbags.com is registered to bin cheng, 701 First Ave, Sunnyvale, CA 94089, kufogavicx@yahoo.com. The domain name registry for choosecoachbags.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for choosecoachbags.com is Melbourne It, Ltd.

f. Upon information and belief, the domain name coach-bag.org is registered to Nick kim, 5360 Orleans, El Paso, TX 79924, snowamber@yeah.net. The domain name registry for coach-bag.org is Public Interest Registry, 1775 Wiehle Avenue, Suite 200, Reston, Virginia 20190. The domain name registrar for coach-bag.org is Godaddy.com, Inc.

g. Upon information and belief, the domain name coachbagsale.com is registered to WhoisGuard Protected, 8939 S Sepulveda Boulevard, #110-732, Westchester, CA

90045 US, eac604bfa8754534bc1a67842fbceb87.protect@whoisguard.com. The domain name registry for coachbagsale.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for coachbagsale.com is Enom, Inc.

h. Upon information and belief, the domain name coachbagselling.com is registered to Hostmonster.com, Hostmonster, Inc., 1958 South 950 East, Provo, UT 84606 US, support@hostmonster.com. The domain name registry for coachbagselling.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for coachbagselling.com is Fastdomain, Inc.

i. Upon information and belief, the domain name coachbagsplaza.com is registered to Sue Piti, 42979 Golf View DriveChantilly, Virginia, Alabama 20152, ovjwiu6593@hotmail.com. The domain name registry for coachbagsplaza.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for coachbagsplaza.com is Godaddy.com, Inc.

j. Upon information and belief, the domain name coachbagsplaza123.com is registered to Ctry Client, Da Sheng Sate, Jinghua, Alabama 34223, presswiki@hotmail.com. The domain name registry for coachbagsplaza123.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for coachbagsplaza123.com is Godaddy.com, Inc.

k. Upon information and belief, the domain name coachbagsplaza456.com is registered to Ctry Client, Da Sheng Sate, Jinghua, Alabama 34223, presswiki@hotmail.com. The domain name registry for coachbagsplaza456.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for coachbagsplaza456.com is Godaddy.com, Inc.

l. Upon information and belief, the domain name coachcheapbags.com is registered to Choo, Yuki, 56w. South Orange Avenue South Orange, New York, New Jersey 12210, tincura25@hotmail.com. The domain name registry for coachcheapbags.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for coachcheapbags.com is Godaddy.com, Inc.

m. Upon information and belief, the domain name coachcheapoutlet.com is registered to jordan shoes, alabama NY, new york, Alabama 12210, presswiki@hotmail.com. The domain name registry for coachcheapoutlet.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for coachcheapoutlet.com is Godaddy.com, Inc.

n. Upon information and belief, the domain name coacheapoutlet.com is registered to Protected Domain Service, P.O. Box 6197, Denver, CO 80206, coacheapoutlet.com@protecteddomainservices.com. The domain name registry for coacheapoutlet.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for coacheapoutlet.com is Name.Com LLC.

o. Upon information and belief, the domain name coach-factory-store.com is registered to jordan shoes, New York, Alabama 12210 USA, presswiki@hotmail.com. The domain name registry for coach-factory-store.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for coach-factory-store.com is Godaddy.com, Inc.

p. Upon information and belief, the domain name coach-factory-stores.com is registered to Elizabeth Rodriguez, 443 Leggett Oaks Lane, Lawrenceville, Georgia 33043 USA, mufnpky8996@hotmail.com. The domain name registry for coach-factory-stores.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for coach-factory-stores.com is Godaddy.com, Inc.

q. Upon information and belief, the domain name coachor.com is registered to J&C LLC, Bobby David, New York 903 Road, New York, 11305, US, esellmarket@gmail.com. The domain name registry for coachor.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for coachor.com is Name.Com LLC.

r. Upon information and belief, the domain name coachotsale.com is registered to Protected Domain Service, P.O. Box 6197, Denver, CO 80206, coachotsale.com@protecteddomainservices.com. The domain name registry for coachotsale.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for coachotsale.com is Name.Com LLC.

s. Upon information and belief, the domain name coachoutlet4u.org is registered to Bluehost Inc., 1958 South 950 East, Provo, UT 84606 US, whois@bluehost.com. The domain name registry for coachoutlet4u.org is Public Interest Registry, 1775 Wiehle Avenue, Suite 200, Reston, Virginia 20190. The domain name registrar for coachoutlet4u.org is Fast Domain Inc.

t. Upon information and belief, the domain name coach-outlet-bags.com is registered to Jordan Shoes, Alabama NY, New York, Alabama 12210, presswiki@hotmail.com. The domain name registry for coach-outlet-bags.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for coach-outlet-bags.com is Godaddy.Com, Inc.

u. Upon information and belief, the domain name coachoutletdirect.com is registered to Guo Yi, Meiguoniuyuediwujie, California, CN 951011, 1013535078@qq.com. The domain name registry for coachoutletdirect.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for coachoutletdirect.com is 35 Technology Co., Ltd.

v. Upon information and belief, the domain name coachoutletforsale.com is registered to Lijianfan, Li Cheng Qu, China, AL, 351100 US, 537553944@qq.com. The domain name registry for coachoutletforsale.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for coachoutletforsale.com is Xiamen Ename Network Technology Corporation Limited DBA Ename Corp.

w. Upon information and belief, the domain name coachoutletoffer.com is registered to Chanel, Inc., 9 West 57th Street, New York, New York 10019, United States, legal@chanel-counterfeitenforcement.com. The domain name registry for coachoutletoffer.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for coachoutletoffer.com is Godaddy.com, Inc.

x. Upon information and belief, the domain name coach-outletonline.com is registered to Tim RhudY, 1213 N Marshall Street, Henderson, Texas 75652, United States, colepenam@gmail.com. The domain name registry for coach-outletonline.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for coach-outletonline.com is Godaddy.com, Inc.

y. Upon information and belief, the domain name coachoutletsales.com is registered to Keith Barry, 75 Cabot Street Apartment 12, Beverly, Maine 01915, United States, 537553944@qq.com. The domain name registry for coachoutletsales.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for coachoutletsales.com is Godaddy.com, Inc.

z. Upon information and belief, the domain name coach-outletshop.com is registered to Tim RhudY, 1213 N Marshall Street, Henderson, Texas 75652, United States, colepenam@gmail.com. The domain name registry for coach-outletshop.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for coach-outletshop.com is Godaddy.com, Inc.

aa. Upon information and belief, the domain name coachoutletusa.com is registered to Whois Privacy Protection Service, 14150 NE 20th St-F1, CO coachoutletusa.com, Bellevue, WA 98007, US, dsyylswf@whoisprivacyprotect.com. The domain name registry for coachoutletusa.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for coachoutletusa.com is Enom, Inc.

bb. Upon information and belief, the domain name coach-purses-outlet.com is registered to Kelly Sanders, 421 Riverside Dr, Jamestown, Kentucky 42629, United States, xsifdro58@hotmail.com. The domain name registry for coach-purses-outlet.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for coach-purses-outlet.com is Godaddy.com, Inc.

cc. Upon information and belief, the domain name coachsalebags.com is registered to Marquis Murrell, 13601 Green Spire Circle, Chester, Armed Forces Pacifc 23836, United States, gelntih22@hotmail.com. The domain name registry for coachsalebags.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for coachsalebags.com is Godaddy.com, Inc.

dd. Upon information and belief, the domain name coachsaler.com is registered to Marquis Murrell, 13601 Green Spire Circle, Chester, Armed Forces Pacifc 23836, United States, gelntih22@hotmail.com. The domain name registry for coachsaler.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for coachsaler.com is Godaddy.com, Inc.

ee. Upon information and belief, the domain name discountcoachhandbag.com is registered to protected Domain Service - Customer ID: NCR-1277827, P.O. Box 6197, Denver, CO 80206, discountcoachhandbag.com@protecteddomainservices.com. The domain name registry for discountcoachhandbag.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for discountcoachhandbag.com is NAME.COM LLC.

ff. Upon information and belief, the domain name docoach.com is registered to protected Domain Service - Customer ID: NCR-2699687, P.O. Box 6197, Denver, CO 80206, docoach.com@protecteddomainservices.com. The domain name registry for docoach.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for docoach.com is Name.Com LLC.

gg. Upon information and belief, the domain name coachboots.org is registered to AnnaAn, New York, New York 056891, 01589614@hotmail.com. The domain name registry for coachboots.org is Public Interest Registry, 1775 Wiehle Avenue, Suite 200, Reston, Virginia 20190. The domain name registrar for coachboots.org is currently unknown.

hh. Upon information and belief, the domain name us-coachhandbags.com is registered to Maloney Kevin, 516 West 34th St, New York, NY 10001, United States, presswiki@hotmail.com. The domain name registry for us-coachhandbags.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for us-coachhandbags.com is Dobster, Inc.

ii. Upon information and belief, the domain name discount-coachhandbags.com is registered to Whois Privacy Protection Service, PMB 368, 14150 NE 20th St - F1, C/O discount-coachhandbags.com, Bellevue, WA 98007, United States, qdnqxcrd@whoisprivacyprotect.com. The domain name registry for discount-coachhandbags.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for discount-coachhandbags.com is Enom, Inc.

jj. Upon information and belief, the domain name stylishcoachbag.com is registered to hanguobin, Georgia on the 9th Street, Culver Town, Masheerde, 90097, WG United States, sales@stylishcoachbag.com. The domain name registry for stylishcoachbag.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for stylishcoachbag.com is Beijing Innovative Linkage Technology Ltd. DBA dns.com.cn.

kk. Upon information and belief, the domain name icoachhandbagsbags.com is registered to Bill Bill, New York, New York 988888, 23232323@WW.COM. The domain name registry for icoachhandbagsbags.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for icoachhandbagsbags.com is c Jiangsu Bangning Science & Technology Co. Ltd.

ll. Upon information and belief, the domain name outlet-coach-handbags.com is registered to Cecil, Shannon, 1283 Vignola Court, Brentwood, Colorado 94513, United States, fvdvbxg673@hotmail.com. The domain name registry for outlet-coach-handbags.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for outlet-coach-handbags.com is Godaddy.com, Inc.

mm. Upon information and belief, the domain name replica-coach-bags.com is registered to Gidcumb, Michael, 506 Louisiana Ave, Clarksville, Tennessee 37042, United States, dtyjimz853@hotmail.com. The domain name registry for replica-coach-bags.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for replica-coach-bags.com is Godaddy.com, Inc.

nn. Upon information and belief, the domain name replicacoachsunglasses.com is registered to Larry Perry, 37118 Shadow Wood Lane, Fruitland Park, Florida 34731, United States, funfundraiser4u@gmail.com. The domain name registry for replicacoachsunglasses.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for replicacoachsunglasses.com is Godaddy.com, Inc.

oo. Upon information and belief, the domain name salecheapcoach.com is registered to lance lance, 1203 Lumpkin Ave, Tupelo, Mississippi 38801, United States, dearpurses@gmail.com. The domain name registry for salecheapcoach.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for salecheapcoach.com is Godaddy.com, Inc.

pp. Upon information and belief, the domain name womencoachhandbags.com is registered to Rocky Browns, futian, shenzhen, West Virginia 10567, United States, blackmasknight@gmail.com. The domain name registry for womencoachhandbags.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for womencoachhandbags.com is Godaddy.com, Inc.

qq. Upon information and belief, the domain name coachdayss.com is registered to Shannon Bennett, Pennsylvania, 17013, 317013 Pennsylvania, United States, terrycn@live.cn. The domain name registry for coachdayss.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for coachdayss.com is Internet.Bs Corp.

rr. Upon information and belief, the domain name uscoachoutlet.org is registered to con lin, 516 West 34th St New York, NY 10001 United States, 85092522@qq.com. The domain name registry for uscoachoutlet.org is Public Interest Registry, 1775 Wiehle Avenue, Suite 200, Reston, Virginia 20190. The domain name registrar for uscoachoutlet.org is Hichina Zhicheng Technology Ltd.

ss. Upon information and belief, the domain name Coachoutlethandbags.net is registered to Yuansheng Dsfs, Putian, Fujian 351111 United States, yuansheng100@hotmail.com. The domain name registry for Coachoutlethandbags.net is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for Coachoutlethandbags.net is Jiangsu Bangning Science & Technology Co. Ltd.

tt. Upon information and belief, the domain name Nicecoachbags.com is registered to Protected Domain Service, P.O. Box 6197, Denver, CO 80206, nicecoachbags.com@protecteddomainservices.com. The domain name registry for Nicecoachbags.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for Nicecoachbags.com is Name.Com LLC.

uu. Upon information and belief, the domain name yourcoachbags.com is registered to Protected Domain Service, P.O. Box 6197, Denver, CO 80206, yourcoachbags.com@protecteddomainservices.com. The domain name registry for yourcoachbags.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for yourcoachbags.com is Name.Com LLC.

vv. Upon information and belief, the domain name coachbagsdigg.com is registered to Hostmonster Inc., 1958 South 950 East, Provo, Utah 84606, United States, support@hostmonster.com. The domain name registry for coachbagsdigg.com is

VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for coachbagsdigg.com is Fast Domain Inc.

ww. Upon information and belief, the domain name coachhandbags4outlet.com is registered to Bluehost, Inc., 1958 South 950 East, Provo, Utah 84604, United States, whois@bluehost.com. The domain name registry for coachhandbags4outlet.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for coachhandbags4outlet.com is Fast Domain Inc.

xx. Upon information and belief, the domain name stylishcoachbag.com is registered to hanguobin, Georgia on the 9th Street, Culver town, Masheerde, 90097, WG United States, sales@stylishcoachbag.com. The domain name registry for stylishcoachbag.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for stylishcoachbag.com is Beijing Innovative Linkage Technology Ltd. DBA Dns.Com.Cn.

yy. Upon information and belief, the domain name coach-purses-shoes-jewelry.com is registered to WhoisGuard Protected, 8939 S Sepulveda Boulevard, #110-732, Westchester, CA 90045 US, b4c8bc95a6c94900964876d47d926540.protect@whc. The domain name registry for coach-purses-shoes-jewelry.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for coach-purses-shoes-jewelry.com is Enom, Inc.

zz. Upon information and belief, the domain name discounts-coach.com is registered to Kevnn Tony, Shengtong Road, Guangzhou, Maryland 21238, United States, admin@topxiang.com. The domain name registry for discounts-coach.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for discounts-coach.com is Godaddy.com, Inc.

aaa. Upon information and belief, the domain name coachhandbags7.com is registered to Go Mom, Go Mom Streets On 38, Mom, Alaska 63685, needapairshoe@gmail.com. The domain name registry for coachhandbags7.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for coachhandbags7.com is Godaddy.com, Inc.

bbb. Upon information and belief, the domain name coach-bags-outlets.com is registered to Erica Grieben, fasdfsdfas, Aberdeen, SD 57401 Saint Lucia, joqqmj523@hotmail.com. The domain name registry for coach-bags-outlets.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for coach-bags-outlets.com is Godaddy.com, Inc.

ccc. Upon information and belief, the domain name coachbagsoutlet.org is registered to Sarah Morgan, 358 Kensington Road, East Lansing, MI 49823 USA, ae274@hotmail.com. The domain name registry for coachbagsoutlet.org is Public Interest Registry, 1775 Wiehle Avenue, Suite 200, Reston, Virginia 20190. The domain name registrar for coachbagsoutlet.org is Bizcn.Com, Inc.

ddd. Upon information and belief, the domain name coachbags888.com is registered to Andre Drew, 131 River Park Circle, McDoungh GA 30281, coachbags888@hotmail.com. The domain name registry for coachbags888.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for coachbags888.com is Hichina Zhicheng Technology Ltd.

eee. Upon information and belief, the domain name coachbags2sale.com is registered to DeRon Carr, 13006 E 51 St S, Independence MO 64055, coachbags2sale@hotmail.com. The domain name registry for coachbags2sale.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for coachbags2sale.com is Hichina Zhicheng Technology Ltd.

fff. Upon information and belief, the domain name coach-online-store.com is registered to Go Mom, Go Mom Streets on 38, Mom, Alaska 63685, (336) 159-8625, ctryfans@gmail.com. The domain name registry for coach-online-store.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for coach-online-store.com is Go Daddy, Inc.

ggg. Upon information and belief, the domain name coachonlinestores.com is registered to China Wholesale, US phone (864) 431-4856, China, AL, 351100 US, chinawholesale2011@gmail.com. The domain name registry for coachonlinestores.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for coachonlinestores.com is Dotster, Inc.

hhh. Upon information and belief, the domain name coachoutlet4sale.com is registered to China Wholesale, US phone (864) 431-4856, China, AL, 351100 US, chinawholesale2011@gmail.com. The domain name registry for coachoutlet4sale.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for coachoutlet4sale.com is Dotster, Inc.

iii. Upon information and belief, the domain name coachoutletbags.com is registered to Andy Huang, sle.skels, eksl, als, sla, 361000 US, sweetcheapceo@gmail.com. The domain name registry for coachoutletbags.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for coachoutletbags.com is Name.Com LLC.

jjj. Upon information and belief, the domain name coolcoachhandbags.com is registered to Livio Nespoli, 18809 Jones Street, Elkhorn NE 68022, coolcoachhandbags@hotmail.com. The domain name registry for coolcoachhandbags.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for coolcoachhandbags.com is Hichina Zhicheng Technology Ltd.

kkk. Upon information and belief, the domain name factorycoachoutlets.com is registered to ctry fans, New York, Alaska 34253, ctry1987@gmail.com. The domain name registry for factorycoachoutlets.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for factorycoachoutlets.com is Godaddy.com, Inc.

lll. Upon information and belief, the domain name coach-accessories.com is registered to Protected Domain Service, P.O. Box 6197, Denver, CO 80206, coach-accessories.com@protecteddomainservices.com. The domain name registry for coach-accessories.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for coach-accessories.com is Name.Com LLC.

mmm. Upon information and belief, the domain name online-coach-outlet.com is registered to Jordan Shoes, Alabama Ny, New York, Alabama 12210, presswiki@hotmail.com. The domain name registry for online-coach-outlet.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for online-coach-outlet.com is Godaddy.com, Inc.

nnn. Upon information and belief, the domain name replicacoachoutlet.com is registered to Williams, Lanette, 9401 Starboard Rd NW, Albuquerque, New Mexico 87121, ciixopza14@hotmail.com. The domain name registry for replicacoachoutlet.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for replicacoachoutlet.com is Godaddy.com, Inc.

15. The Fujian Group is defined and described as those infringing domain names whose registrants are, upon information and belief, the same individual or organization as evidenced by their use of fictitious addresses which all include some variation of either the name "Fujian" or "Putian" in their postal address. Although certain of the registrant's names are different, each listed address and/or registrant name is, upon information and belief, fictitious based on the "return to sender" notices that Coach has received in response to its attempts to reach the listed registrants by postal mail. [*See* Cole Dec.] Fujian is a province on the south eastern coast of China, and Putian is a city within the Fujian province, further suggesting that the "registrants" of these infringing domain names are related to one another. The Fujian Group's interconnectedness is further evidenced by the similarities of the infringing domain names, and the appearance and composition of the sites (*compare, e.g.,* cheapcoach.us *with* cheapcoachbags.us, cheapcoachbagsoutlet.com, cheap-coach-handbags.net, *and* cheap-coach-

outlets; *compare also* coachbags-outlet.com, *with* coach-bags-outlet.com, coach-bags-outlet.us, *and* coachbags-shops.com). The Fujian Group is comprised of the following infringing domain names:

a. Upon information and belief, the domain name allofcoach.com is registered to Linjiancheng, Putian, Putian Putian Fujian [sic] 360001 CN, jiancheng lin web@zgsj.com. The domain name registry for allofcoach.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for allofcoach.com is Jiangsu Bangning Science & Technology Co. Ltd.

b. Upon information and belief, the domain name bagscoach.com is registered to ailian mao, Qianpu luck Road, Industrial Area No. 4, jinjiang, 352411 Fujian CN, maoailian@sina.cn. The domain name registry for bagscoach.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for bagscoach.com is Beijing Innovative Linkage Technology Ltd.

c. Upon information and belief, the domain name bestcoachhandbags.com is registered to Lin Xi, #231 Dongtuo Street Chanshanqu, Fuzhou, Fuijan CN, 15762325@qq.com. The domain name registry for bestcoachhandbags.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for bestcoachhandbags.com is Xin Net Technology Corporation.

d. Upon information and belief, the domain name buydiscountcoachbag.com is registered to Chen DongHua, Xiamen commercial building 258, XM fujian 361000 CN, goodushop@yahoo.cn. The domain name registry for buydiscountcoachbag.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for buydiscountcoachbag.com is Bizcn.Com, Inc.

e. Upon information and belief, the domain name cheapcoach.us is registered to Wei Chen, no356 Xiahe Road China, Xiamen, Fujian, 36000 CN, zhengwei1900@163.com. The domain name registry for cheapcoach.us is

Neustar, Inc., 21575 Ridgetop Circle, Sterling, Virginia 20166. The domain name registrar for cheapcoach.us is Godaddy.com, Inc.

f. Upon information and belief, the domain name cheapcoachbags.us is registered to Guo Lin, Fj, Fj, Fujian 350000 CN, 505174048@263.com. The domain name registry for cheapcoachbags.us is Neustar, Inc., 21575 Ridgetop Circle, Sterling, Virginia 20166. The domain name registrar for cheapcoachbags.us is Web Commerce Communications, Ltd.

g. Upon information and belief, the domain name cheapcoachbagsoutlet.com is registered to Linxianjing, goutouyuanquanxingyuandaxia307shi, Putian 351100 Fujian CN, info@qixian.cn. The domain name registry for cheapcoachbagsoutlet.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for cheapcoachbagsoutlet.com is Beijing Innovative Linkage Technology Ltd.

h. Upon information and belief, the domain name cheap-coach-handbags.net is registered to N/A, No.362 Dongzhengroad, Xiamen, Fujian 361000, mill9190@gmail.com. The domain name registry for cheap-coach-handbags.net is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for cheap-coach-handbags.net is Enom, Inc.

i. Upon information and belief, the domain name cheap-coach-outlets.com is registered to Liyanghua, Gu Shan Qu, Fuzhou Fujian 350000, 112252347@qq.com. The domain name registry for cheap-coach-outlets.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for cheap-coach-outlets.com is Bizcn.Com, Inc.

j. Upon information and belief, the domain name cheapcoachstores.com is registered to Lin Huang, Harbour, Putian Fujian CN, copolar@163.com. The domain name registry for cheapcoachstores.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for cheapcoachstores.com is Hichina Zhicheng Technology Ltd.

k. Upon information and belief, the domain name coachandbag.net is registered to lin li, hua lin lu 1212 hao, shaem fujian cn 350056, shopping666666@yahoo.cn. The domain name registry for coachandbag.net is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for coachandbag.net is Xin Net Technology Corporation.

l. Upon information and belief, the domain name coachandbagsoutlet.com is registered to Lin Yi, Room 303, Unit 4, Buiding No. 21-3, Fushun West Road, chengxiang District,fujian Province, 158258338@qq.com. The domain name registry for coachandbagsoutlet.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for coachandbagsoutlet.com is Name.Com LLC.

m. Upon information and belief, the domain name coachaneloutlet.com is registered to Whois Privacy Protection Service, No. 61 Wanghai Road, Xiamen Software Park, xiamen fujian 361008 CN, hdvtlbnbnj@whoisservices.cn. The domain name registry for coachaneloutlet.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for coachaneloutlet.com is Bizcn.Com, Inc.

n. Upon information and belief, the domain name coach-bag-outlet.com is registered to Ke Qingyong, Xiamolu 278hao202shi, Putian Fujian 351100, 122154999@QQ.COM. The domain name registry for coach-bag-outlet.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for coach-bag-outlet.com is Beijing Innovative Linkage Technology Ltd.

o. Upon information and belief, the domain name coach-bags2u.com is registered to A Qiang Ltd, Fuzhou Load, Fuzhou, Fujian 361000, supplier23@live.cn. The domain name registry for coach-bags2u.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for coach-bags2u.com is Enom, Inc.

p. Upon information and belief, the domain name coachbagsbasic.com is registered to Linxiansheng, Putian, Putian Fujian 351100, 404505178@qq.com. The domain name registry for coachbagsbasic.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for coachbagsbasic.com is Bizcn.Com, Inc.

q. Upon information and belief, the domain name coachbagshop.com is registered to Lin Li, Hua Lin Lu 1212 Hao, Shamen, Fujian, China 350056, shopping666666@yahoo.cn. The domain name registry for coachbagshop.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for coachbagshop.com is Xin Net Technology Corporation.

r. Upon information and belief, the domain name coachbagsok.com is registered to Zeng Wen, #43 Meiyuan Road, Putian City, FJ, 351100 China, 2046614@qq.com. The domain name registry for coachbagsok.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for coachbagsok.com is Hichina Zhicheng Technology Ltd.

s. Upon information and belief, the domain name coachbags-outlet.com is registered to Zeng Wen, #43 Meiyuan Road, Putian City, FJ, 351100 China, 2046614@qq.com. The domain name registry for coachbags-outlet.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for coachbags-outlet.com is Hichina Zhicheng Technology Ltd.

t. Upon information and belief, the domain name coach-bags-outlet.com is registered to Xiazhong, Shenglilu, Putian Fujian 351100, yexiazhong@yahoo.com. The domain name registry for coach-bags-outlet.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for coach-bags-outlet.com is Jiangsu Bangning Science & Technology Co. Ltd.

u. Upon information and belief, the domain name coach-bags-outlet.us is registered to Li Guo Zhen, Xin Yi Xuan, Sanxin Garden, Purian Fujian Cn 351100, sneakerkey@gmail.com. The domain name registry for coach-bags-outlet.us is Neustar, Inc., 21575 Ridgetop Circle, Sterling, Virginia 20166. The domain name registrar for coach-bags-outlet.us is UK2 Group Ltd.

v. Upon information and belief, the domain name coachbagsoutlets.org is registered to Zhu Xiong, Zhuxiong, Putian FJ 351144 CN, 407825234@qq.com. The domain name registry for coachbagsoutlets.org is Public Interest Registry, 1775 Wiehle Avenue, Suite 200, Reston, Virginia 20190. The domain name registrar for coachbagsoutlets.org is Hichina Zhicheng Technology Limited.

w. Upon information and belief, the domain name coachbags-shops.com is registered to ChenRongQin, LiChengQuDongDaLu, PuTianShi, FuJianSheng 351100, chenrq8833@hotmail.com. The domain name registry for coachbags-shops.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for coachbags-shops.com is Xin Net Technology Corporation.

x. Upon information and belief, the domain name coachbagstrade.com is registered to Sports Sdfss, Fu Zhou, Fu Zhou 351100 Fj Cn, domain@abcde.cn. The domain name registry for coachbagstrade.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for coachbagstrade.com is Beijing Innovative Linkage Technology Ltd.

y. Upon information and belief, the domain name coachbags-us.com is registered to Zheng Liqun, Fenghuang Hill, Putian Fujian 351100, 384046652@qq.com. The domain name registry for coachbags-us.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for coachbags-us.com is Hichina Zhicheng Technology Ltd.

z. Upon information and belief, the domain name coachbags-usa.com is registered to Huangjinfeng, putianshichengxiangqulichengdadao3086dong309shi, Putian Fujian 351100, 404898547@qq.com. The domain name registry for coachbags-usa.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for coachbags-usa.com is Beijing Innovative Linkage Technology Ltd.

aa. Upon information and belief, the domain name coachchanelhandbags.com is registered to Lin, Hao Lin, Putian Fujian 351100 CN, 505167348@qq.com. The domain name registry for coachchanelhandbags.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for coachchanelhandbags.com is Bizcn.Com, Inc.

bb. Upon information and belief, the domain name coachcoachcoach.com is registered to Huang Yuanpen, Chenxiang Qu Ba Shi Mu Xiaoqu, Putian Fujian 351100 CN, lye9870@163.com. The domain name registry for coachcoachcoach.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for coachcoachcoach.com is Beijing Innovative Linkage Technology Ltd.DBA Dns.Com.Cn.

cc. Upon information and belief, the domain name coach-diaper-bag.com is registered to Xue Fan Ping, Putian Cheng Xian 1219, Putian Fujian 351100 CN, doujiangci6614@gmail.com. The domain name registry for coach-diaper-bag.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for coach-diaper-bag.com is Bizcn.Com, Inc.

dd. Upon information and belief, the domain name coachfactory-outlets.com is registered to Chen Xuefeng, No.3,Lichen Road,Chengxiang Area, Putian, Fujian 351100 China, cheng53955@hotmail.com. The domain name registry for coachfactory-outlets.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for coachfactory-outlets.com is Hichina Zhicheng Technology Ltd.

ee. Upon information and belief, the domain name coach-factory-outlets.com is registered to Ke, Fa, Chengxiangqu, Putian, Fujian 351100 China, fakegouwu@gmail.com. The domain name registry for coach-factory-outlets.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for coach-factory-outlets.com is Godaddy.com, Inc.

ff. Upon information and belief, the domain name coachfactoryoutlets.org is registered to Zhu Xiong, Zhuxiong, Putian Fuijan 351144 china, 407825234@qq.com. The domain name registry for coachfactoryoutlets.org is Public Interest Registry, 1775 Wiehle Avenue, Suite 200, Reston, Virginia 20190. The domain name registrar for coachfactoryoutlets.org is Hichina Zhicheng Technology Limited.

gg. Upon information and belief, the domain name coachforcheap.com is registered to lvdi, fewkd 2dsli 4sds, FuZhouShi FJ China 351100, 88166606@qq.com. The domain name registry for coachforcheap.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for coachforcheap.com is Todaynic.Com, Inc.

hh. Upon information and belief, the domain name coachhandbagoutlet.us is registered to Xiaoqing Ren, 30#, Dongmei Village, Pinghai, Putian, Fujian, Xiuyu Putian 351100 CN, season_duosiyibei@hotmail.com. The domain name registry for coachhandbagoutlet.us is Neustar, Inc., 21575 Ridgetop Circle, Sterling, Virginia 20166. The domain name registrar for coachhandbagoutlet.us is Name.Com LLC.

ii. Upon information and belief, the domain name coachhandbags.biz is registered to gaoming, putiangoutouyuanquanxingyuandaxia308shi, Putian, Fujian 351100 China, 309654719@qq.com. The domain name registry for coachhandbags.biz is Neustar, Inc., 21575 Ridgetop Circle, Sterling, Virginia 20166. The domain name registrar for coachhandbags.biz is Todaynic.Com, Inc.

jj. Upon information and belief, the domain name coachhandbags.us is registered to fa ke, chengxiangqu, putian Fujian 351100 China, fakegouwu@gmail.com. The domain name registry for coachhandbags.us is Neustar, Inc., 21575 Ridgetop

Circle, Sterling, Virginia 20166. The domain name registrar for coachhandbags.us is Godaddy.com, Inc.

kk. Upon information and belief, the domain name coachhandbags1.com is registered to Bitebi network Ltd., Software Park, Guanri Road 26 506#, Xiamen, FuJian 361000, Progress2002@163.com. The domain name registry for coachhandbags1.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for coachhandbags1.com is Godaddy.com, Inc.

ll. Upon information and belief, the domain name coachhandbags1941.com is registered to Zheng Liqun, Fenghuang Hill, Putian, Fujian 351100 China, 384046652@qq.com. The domain name registry for coachhandbags1941.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for coachhandbags1941.com is Hichina Zhicheng Technology Ltd.

mm. Upon information and belief, the domain name coachhandbagscity.com is registered to Dexiong Weng, Putianshilichengqumeiyuanlu116hao, Putianshi Fujian 351100 CN, 527881458@qq.com. The domain name registry for coachhandbagscity.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for coachhandbagscity.com is Hichina Zhicheng Technology Ltd.

nn. Upon information and belief, the domain name coachhandbagscom.com is registered to Zhong Tai, Dfjkjl, Putian Fujian 351100, augustusche@foxmail.com. The domain name registry for coachhandbagscom.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for coachhandbagscom.com is Bizcn.Com, Inc.

oo. Upon information and belief, the domain name coachhandbagsell.com is registered to Wang Zhen, Huli Xiamen, Xiamen 352200 Fujian CN, 25063324@qq.com. The domain name registry for coachhandbagsell.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for coachhandbagsell.com is Beijing Innovative Linkage Technology Ltd.

pp. Upon information and belief, the domain name coach-handbagshop.net is registered to Chen DongHua, Xiamen Commercial Building 258, XM Fujian 361000 CN, goodushop@yahoo.cn. The domain name registry for coach-handbagshop.net is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for coach-handbagshop.net is Bizcn.Com, Inc.

qq. Upon information and belief, the domain name coachhandbags-outlet.com is registered to buyuantrade@gmail.com, 1901,#B-6,Xiushui road, GuangZhou Fujian 351100 CN, admin@CoachHandbagsPurse.com. The domain name registry for coachhandbags-outlet.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for coachhandbags-outlet.com is Xin Net Technology Corporation.

rr. Upon information and belief, the domain name coachhandbags-outlet.us is registered to Xiaoqing Ren, 30#, Dongmei Village, Pinghai, Putian, Fujian, Xiuyu Putian 351100 CN, season_duosiyibei@hotmail.com. The domain name registry for coachhandbags-outlet.us is Neustar, Inc., 21575 Ridgetop Circle, Sterling, Virginia 20166. The domain name registrar for coachhandbags-outlet.us is Name.Com.

ss. Upon information and belief, the domain name coachnewarrival.com is registered to Qingfei Lin, Xiu Shui Hua Ting B Area 3 No. 502, Pu Tian, Fujian, 351100, China, yzyzyyz@hotmail.com. The domain name registry for coachnewarrival.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for coachnewarrival.com is Xin Net Technology Corp.

tt. Upon information and belief, the domain name coachonline.us is registered to Xu Junyu, Kanetrade, Datang 1606, Pu Tian, Fujian, 351100, China, 42327214@qq.com. The domain name registry for coachonline.us is Neustar, Inc., 21575 Ridgetop Circle, Sterling, Virginia 20166. The domain name registrar for coachonline.us is Name.com.

uu. Upon information and belief, the domain name coachonsale.net is registered to Wufan Fan Wu, Fujianputian, Putian Fujian 351100 China, web@xunway.com. The domain name registry for coachonsale.net is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for coachonsale.net is Jiangsu Bangning Science & Technology Co. Ltd.

vv. Upon information and belief, the domain name coachopen.com is registered to Li Yaxiachai, Shongshanglu, Putian, FJ, 345345, CN, 1450009368@qq.com. The domain name registry for coachopen.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for coachopen.com is Hichina Zhicheng Technology Ltd.

ww. Upon information and belief, the domain name coachoutletcanada.org is registered to Gaini Chen, Chen Gai ni, chengxian 1192, Putian, Fujian 351100 China, weijulang1604@gmail.com. The domain name registry for coachoutletcanada.org is Public Interest Registry, 1775 Wiehle Avenue, Suite 200, Reston, Virginia 20190. The domain name registrar for coachoutletcanada.org is Bizcn.Com, Inc.

xx. Upon information and belief, the domain name coachoutlet-discount.com is registered to Hao Kan Tou, Fu Jian Sheng, Pu Tian Shi, Beijing 100101, xiaozxin@hotmail.com. The domain name registry for coachoutlet-discount.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for coachoutlet-discount.com is Xin Net Technology Corporation.

yy. Upon information and belief, the domain name coachoutletdiscount.net is registered to Hao Kan Tou, Fu Jian Sheng, Pu Tian Shi, Beijing 100101, xiaozxin@hotmail.com. The domain name registry for coachoutletdiscount.net is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for coachoutletdiscount.net is Hichina Zhicheng Technology Ltd.

zz. Upon information and belief, the domain name coachoutlete.org is registered to Zhaoming, FuJianShengFuzhouShiTianQuanLu113Hao, Fuzhoushi, Fujian 350000 China, alicowholesale@hotmail.com. The domain name registry for coachoutlete.org is Public Interest Registry, 1775 Wiehle Avenue, Suite 200, Reston, Virginia 20190. The domain name registrar for coachoutlete.org is Xin Net Technology Corporation.

aaa. Upon information and belief, the domain name coach-outlet-factory.com is registered to Mike Jordan, Putian Meiyuan, China, Putian, CO 351100, xiaoluaaaa@126.com. The domain name registry for coach-outlet-factory.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for coach-outlet-factory.com is Dotster, Inc.

bbb. Upon information and belief, the domain name coachoutletonlinestore.com is registered to Fa Ke, Chengxiangqu, Putian, Fujian 351100 China, fakegouwu@gmail.com. The domain name registry for coachoutletonlinestore.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for coachoutletonlinestore.com is Godaddy.com, Inc.

ccc. Upon information and belief, the domain name coach-outlet-purses.com is registered to Chen Jianrong, Fujian, Putian,, 351100 China, no2carter@gmail.com. The domain name registry for coach-outlet-purses.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for coach-outlet-purses.com is Hichina Zhicheng Technology Ltd.

ddd. Upon information and belief, the domain name coachoutletretail.com is registered to Qiao Aima, Fu Jian Sha Men, Shamen, Fujian, China 361000, artestvon@gmail.com. The domain name registry for coachoutletretail.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for coachoutletretail.com is Hichina Zhicheng Technology Ltd.

eee. Upon information and belief, the domain name coach-outlets.org is registered to Yuansheng dsfs, Fujian province, Xiamen City, Putian, Fujian 351111 China, yuadf00@hotmail.com. The domain name registry for coach-outlets.org is Public Interest Registry, 1775 Wiehle Avenue, Suite 200, Reston, Virginia 20190. The domain name registrar for coach-outlets.org is Hichina Zhicheng Technology Ltd.

fff. Upon information and belief, the domain name coachoutlets.us is registered to Qing Lin, Chenxiang, Putian, Fujian 351100 China, info@dingdian.cn. The domain name registry for coachoutlets.us is Neustar, Inc., 21575 Ridgetop Circle, Sterling, Virginia 20166. The domain name registrar for coachoutlets.us is Godaddy.com, Inc.

ggg. Upon information and belief, the domain name coach-outlets-factory.com is registered to Top Trade, Putian, Fujian 351100 China, needapairshoe@gmail.com. The domain name registry for coach-outlets-factory.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for coach-outlets-factory.com is Network Solutions, LLC.

hhh. Upon information and belief, the domain name coach-outletstore.com is registered to Purejun Zhang, No. 2 Chiqi village, Putian, Fujian 351100 China, jaimin.chen@gmail.com. The domain name registry for coach-outletstore.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for coach-outletstore.com is Godaddy.com, Inc.

iii. Upon information and belief, the domain name coach-outletstore.com is registered to Purejun Zhang, No. 2 Chiqi village, Putian, Fujian 351100 China, jaimin.chen@gmail.com. The domain name registry for coach-outletstore.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for coach-outletstore.com is Godaddy.com, Inc.

jjj. Upon information and belief, the domain name coach-outletstores.com is registered to Lu mingren, 100, Guangqiao street, Licheng District, Putian, Fujian

351100 China, http.lmt@hotmail.com. The domain name registry for coach-outletstores.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for coach-outletstores.com is Xin Net Technology Corporation.

kkk. Upon information and belief, the domain name coachoutletstoresonline.com is registered to Hao Chen, 1256#, Wenxian Road, putian, Fujian 351100 China, 54981835@qq.com. The domain name registry for coachoutletstoresonline.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for coachoutletstoresonline.com is Bizcn.Com, Inc.

lll. Upon information and belief, the domain name coachpoppybags.com is registered to Knight Dark, Ruanjianuan93#, Fuzhou, Fujian 123342 China, mymbsky@gmail.com. The domain name registry for coachpoppybags.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for coachpoppybags.com is Hichina Zhicheng Technology Ltd.

mmm. Upon information and belief, the domain name coachpursehandbags.com is registered to intern international trade ltd, Yaowu Cai, Xi Tian Wei Zhen Dong Hu Cun 11 Zu, Pu Tian, Fu Jian 351100 China, xiezi5@yeah.net. The domain name registry for coachpursehandbags.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for coachpursehandbags.com is Name.Com LLC.

nnn. Upon information and belief, the domain name coachpurseoutlet.us is registered to Xiaoqing Ren, 30#, Dongmei Village, Pinghai, Putian, Fujian, Xiuyu Putian 351100 CN, season_duosiyibei@hotmail.com. The domain name registry for coachpurseoutlet.us is Neustar, Inc., 21575 Ridgetop Circle, Sterling, Virginia 20166. The domain name registrar for coachpurseoutlet.us is Name.Com LLC.

ooo. Upon information and belief, the domain name coachpurses-outlet.com is registered to Zeng Wen, No 43 Meiyuan Rd, Putian City, Putiank, FJ 351100

China, 2046614@qq.com. The domain name registry for coachpurses-outlet.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for coachpurses-outlet.com is Hichina Zhicheng Technology Ltd.

ppp. Upon information and belief, the domain name coachpursesstore.net is registered to Mingming Chen, Hu Li Qu Fang Zhong Lu 79, Shamen, Fujian 365000 China, shirley-pingping@hotmail.com. The domain name registry for coachpursesstore.net is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for coachpursesstore.net is Hichina Zhicheng Technology Ltd.

qqq. Upon information and belief, the domain name coachretail.us is registered to Ming Lin, Putian, Fujian 351100 China, 505174048@qq.com. The domain name registry for coachretail.us is Neustar, Inc., 21575 Ridgetop Circle, Sterling, Virginia 20166. The domain name registrar for coachretail.us is Web Commerce Communications, Ltd.

rrr. Upon information and belief, the domain name coachretails.com is registered to Zhang Jing, #313dongfang Road, Taijian, Fuzhou 350000, Fujian China, wpfibwb02@163.com. The domain name registry for coachretails.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for coachretails.com is Beijing Innovative Linkage Technology Ltd. DBA Dns.Com.Cn.

sss. Upon information and belief, the domain name coach--outlet.com is registered to Hao Kan Tou, Fu Jian Sheng, Putian Shi, Beijing 100101, diandian101@gmail.com. The domain name registry for coach--outlet.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for coach--outlet.com is Xin Net Technology Corporation.

ttt. Upon information and belief, the domain name coachshandbags.com is registered to Wufan, Fujianputian, Putian Fujian 351100, China, web@xunway.com. The domain name registry for coachshandbags.com is VeriSign, Inc., 21345 Ridgetop

Circle, Dulles, Virginia 20166. The domain name registrar for coachshandbags.com is Jiangsu Bangning Science & Technology Co. Ltd.

uuu. Upon information and belief, the domain name coachshophome.com is registered to Chen DongHua, Xiamen commercial building 258, XM fujian 361000, China, goodushop@yahoo.cn. The domain name registry for coachshophome.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for coachshophome.com is Bizcn.Com, Inc.

vvv. Upon information and belief, the domain name coachshopsale.com is registered to Liuqing Wu, Yang Ban Village Wu Tai #55, putian Fujian 351100 China, 54981835@qq.com. The domain name registry for coachshopsale.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for coachshopsale.com is Bizcn.Com, Inc.

www. Upon information and belief, the domain name coachsneakersonsale.com is registered to Xiao Zhi Ging, Ren Men Road 115, putian fujian 351100 CN, zhiqing888@126.com. The domain name registry for coachsneakersonsale.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for coachsneakersonsale.com is Jiangsu Bangning Science & Technology Co. Ltd.

xxx. Upon information and belief, the domain name coach-style.com is registered to Dai Ping Ping, Li Cheng Road Chenxiang Qu Putian, Putian 351100 FJ CN, ajieaike@163.com. The domain name registry for coach-style.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for coach-style.com is Bejing Innovative Linkage Technology Ltd.

yyy. Upon information and belief, the domain name coach-totes-bags.com is registered to Chen Jianrong, Fujian Putian, Putian Fujian 351100, no2carter@gmail.com. The domain name registry for coach-totes-bags.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for coach-totes-bags.com is Jiangsu Bangning Science & Technology Co.Ltd.

zzz. Upon information and belief, the domain name coachusoutlet.net is registered to dfdsfsdfs sdfdf, dvd sfs f sdf sf, dfgdgdg fujian 351100 CN, 33989281@qq.com. The domain name registry for coachusoutlet.net is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for coachusoutlet.net is Bizcn.Com.Inc.

aaaa. Upon information and belief, the domain name discountcoach-outlet.com is registered to Lai Xiaojie, Shamen Simingqu Ruanjian, Shamen, Fujian 361000 CN, 76866454@qq.com. The domain name registry for discountcoach-outlet.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for discountcoach-outlet.com is Hichina Zhicheng Technology Ltd.

bbbb. Upon information and belief, the domain name discount-coach-outlet-store.com is registered to Sam Young, Wuyi Road, Fuzhou, Fuzhoushi, Fujiansheng China 35000, a_i003@163.com. The domain name registry for discount-coach-outlet-store.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for discount-coach-outlet-store.com is Xin Net Technology Corporation.

cccc. Upon information and belief, the domain name gogocoach.com is registered to Zhang DonQuin, Putian, Fujian 216001, zhangdongqing168@163.com. The domain name registry for gogocoach.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for gogocoach.com is Key-Systems Gmbh.

dddd. Upon information and belief, the domain name coachfanstore.com is registered to Sun, Shaoyuan, Room 1606, Grand Emperial Building, No. 820, Xiahe road, Siming c, Xiamen, fujian 361100 China, tech@easfe.com. The domain name registry for coachfanstore.com is VeriSign, Inc., 21345 Ridgetop

Circle, Dulles, Virginia 20166. The domain name registrar for coachfanstore.com is Godaddy.com, Inc.

eeee. Upon information and belief, the domain name hotcoachbag.com is registered to Hao Lin, Fuzhou, Fuzhou Fujian 351100, 505175638@qq.com. The domain name registry for hotcoachbag.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for hotcoachbag.com is Bizcn.com.,Inc.

ffff. Upon information and belief, the domain name icoachonlineoutlet.net is registered to Ning Zhuang, LiChengQuDongDaLu, Putian, Fujian 351100 China, 165482921@qq.com. The domain name registry for icoachonlineoutlet.net is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for icoachonlineoutlet.net is Hichina Zhicheng Technology Ltd.

gggg. Upon information and belief, the domain name lvcoachoutlet.com is registered to Whois Privacy Protection Service, No. 61 Wanghai Road, Xiamen Software Park, xiamen fujian 361008 CN, znvamcyhdv@whoisservices.cn. The domain name registry for lvcoachoutlet.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for lvcoachoutlet.com is Bizcn.Com,Inc.

hhhh. Upon information and belief, the domain name newbagscoach.com is registered to Zeng Wen, No. 34 Meiyuan Rd Putian, Putian GD 351100 CN, 233333@qq.com. The domain name registry for newbagscoach.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for newbagscoach.com is Hichina Zhicheng Technology Ltd.

iiii. Upon information and belief, the domain name nicecoachhandbags.com is registered to Huang Yuanpen, Cheng Xiang Qu Ba Shi Mu Xiao Qu, Putian City 351100 FJ CN, lye9870@163.com. The domain name registry for nicecoachhandbags.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for nicecoachhandbags.com is Beijing Innovative Linkage Technology Ltd.DBA Dns.Com.Cn.

jjjj. Upon information and belief, the domain name oncoachpurses.com is registered to Zeng Wen, No. 43 Meiyuan Rd Putian City, Putian Fj 351100 Cn, 2046614@qq.com. The domain name registry for oncoachpurses.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for oncoachpurses.com is Hichina Zhicheng Technology Ltd.

kkkk. Upon information and belief, the domain name outlet-coach.com is registered to Chenhan, Goutouyuanquanxingyuandaxia307shi, Putianshi, Fujiansheng, China 351100, info@dingdian.cn. The domain name registry for outlet-coach.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for outlet-coach.com is Xin Net Technology Corporation.

llll. Upon information and belief, the domain name pickcoachbags.com is registered to Lin Zong Jin, Simingqu Hualin Ziweihuayuan 796hao 403shi, Xiamenshi, Fujiansheng, China 361000, homywinter@hotmail.com. The domain name registry for pickcoachbags.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for pickcoachbags.com is Xin Net Technology Corporation.

mmmm. Upon information and belief, the domain name salecoachbag.com is registered to Hu Zhifu, Fujian, Fuzhou, Fuzhou, Fujian 351100 CN, jiajia21987@gmail.com. The domain name registry for salecoachbag.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for salecoachbag.com is Hichina Zhicheng Technology Ltd.

nnnn. Upon information and belief, the domain name shopcoachbags.com is registered to Linsheng Sheng, Fujian Province, Xiamen City, Xiamen 361001 FJ CN, miniyan75@gmail.com. The domain name registry for shopcoachbags.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for shopcoachbags.com is Beijing Innovative Linkage Technology Ltd. DBA Dns.Com.Cn.

oooo. Upon information and belief, the domain name shoppingcoachhandbags.com is registered to Huang Yuanpen, Cheng Xiang Qu Ba Shi Mu Xiao Qu, Putian 351100, lye9870@163.com. The domain name registry for shoppingcoachhandbags.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for shoppingcoachhandbags.com is Beijing Innovative Linkage Technology Ltd.DBA Dns.Com.Cn.

pppp. Upon information and belief, the domain name ukcoachhandbags.com is registered to Lin Long, No. 404, Build 30, Ruanjian yuan er qi, xiamen fujian 361008 CN, goldtradekey2010@hotmail.com. The domain name registry for ukcoachhandbags.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for ukcoachhandbags.com is Bizcn.Com, Inc.

qqqq. Upon information and belief, the domain name usacoachoutlet.com is registered to Chen Hui Juan, Putian City, Fujian Province, Southern Stream, Putian 351100 FJ, China, 982248516@qq.com. The domain name registry for usacoachoutlet.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for usacoachoutlet.com is Beijing Innovative Linkage Technology Ltd. DBA Dns.Com.Cn.

rrrr. Upon information and belief, the domain name usa-coachoutlet.com is registered to Dfasdf Yuansheng, Fujian province, Xiamen City, Putian, Fujian 351111 China, erwer0@hotmail.com. The domain name registry for usa-coachoutlet.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for usa-coachoutlet.com is Hichina Zhicheng Technology Ltd..

ssss. Upon information and belief, the domain name usacoachoutlets.net is registered to Lin Qing, Xiamenshihubinglu335hao, Xiamen Fujian 361027 China, tengteng50@yahoo.com.cn. The domain name registry for usacoachoutlets.net is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for usacoachoutlets.net is Bizcn.Com, Inc.

tttt. Upon information and belief, the domain name usacoachoutlet.net is registered to Yili Su, Xia Men Fu Jian, 361000 China, ptcywl@163.com. The domain name registry for usacoachoutlet.net is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for usacoachoutlet.net is Bizcn.Com, Inc.

uuuu. Upon information and belief, the domain name us-buycoach.com is registered to Lai Jiuxiu, Fujian Province, Putian City, Putian, Fujian 351152 China, a_106169163@163.com. The domain name registry for us-buycoach.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for us-buycoach.com is Hichina Zhicheng Technology Ltd.

vvvv. Upon information and belief, the domain name uscoachbags1941.com is registered to Top Trade, Putian, Putian, Fujian 351100 China, needapairshoe@gmail.com. The domain name registry for uscoachbags1941.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for uscoachbags1941.com is Network Solutions, LLC.

wwww. Upon information and belief, the domain name voguecoachbags.com is registered to Lin Li, Hua Lin Lu 1212 Hao, Shamen, Fujian China 350056, shopping666666@yahoo.cn. The domain name registry for voguecoachbags.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for voguecoachbags.com is Xin Net Technology Corporation.

xxxx. Upon information and belief, the domain name wholesale-coach.com is registered to Zhengheng Zhu, Liyi Road, Putian, 351111 China, niuzhong123@hotmail.com. The domain name registry for wholesale-coach.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for wholesale-coach.com is Fast Domain Inc.

yyyy. Upon information and belief, the domain name buy-coach-handbags.com is registered to Zii Xiongg, Fujian Xiamen, Fujian Xiamen, US 356000, ali21trade@hotmail.com. The domain name registry for buy-coach-handbags.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for buy-coach-handbags.com is Name.Com LLC.

zzzz. Upon information and belief, the domain name coachoutletlinebags.net is registered to Li Aiqiang, Fujian Province, Xiamen City, Xiamen, Fujian 354545 China, coachoutletlinebags01@hotmail.com. The domain name registry for coachoutletlinebags.net is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for coachoutletlinebags.net is Hichina Zhicheng Technology Ltd.

aaaaa. Upon information and belief, the domain name 2010coachoutlet.com is registered to Zeng Wen, No. 34 Meiyuan Rd, Putian 351100 China, 233333@qq.com. The domain name registry for 2010coachoutlet.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for 2010coachoutlet.com is Hichina Zhicheng Technology Ltd.

bbbbb. Upon information and belief, the domain name 2010coachoutletbag.com is registered to Zeng Wen, No. 34 Meiyuan Rd, Putian 351100 China, 233333@qq.com. The domain name registry for 2010coachoutletbag.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for 2010coachoutletbag.com is Hichina Zhicheng Technology Ltd.

ccccc. Upon information and belief, the domain name coach2010outlet.com is registered to Zeng Wen, no. 34 Meiyuan Rd, Putian 351100 China, 233333@qq.com. The domain name registry for coach2010outlet.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for coach2010outlet.com is Hichina Zhicheng Technology Ltd.

ddddd. Upon information and belief, the domain name coachoutletfactory.org is registered to Zhu Xiong, Zhuxiong, Putian FJ 351144 CN, 407825234@qq.com.

The domain name registry for coachoutletfactory.org is Public Interest Registry, 1775 Wiehle Avenue, Suite 200, Reston, Virginia 20190. The domain name registrar for coachoutletfactory.org is Hichina Zhicheng Technology Limited.

eeeee. Upon information and belief, the domain name coachoutletnew.com is registered to Zheng Liqun, Fenghuang Hill, Putian, Fujian 351100 China, 384046652@qq.com. The domain name registry for coachoutletnew.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for coachoutletnew.com is Hichina Zhicheng Technology Ltd.

fffff. Upon information and belief, the domain name coachoutletonline.org is registered to Hao Chen, 1256#, Wenxian Road, Putian, Fujian 351100 China, 54981835@qq.com. The domain name registry for coachoutletonline.org is Public Interest Registry, 1775 Wiehle Avenue, Suite 200, Reston, Virginia 20190. The domain name registrar for coachoutletonline.org is Beijing Innovative Linkage Technology Ltd.

ggggg. Upon information and belief, the domain name coachnewbags.com is registered to Zeng Wen, No. 34 Meiyuan Rd Putian, Putian, GD351100 China, 233333@qq.com. The domain name registry for coachnewbags.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for coachnewbags.com is currently unknown.

hhhhh. Upon information and belief, the domain name fashioncoachbag.com is registered to Zhengliqun, Fuzhoushi Gulouqu Huangpulu, Fuzhoushi Fujian 350001, China, mmocurrencies@gmail.com. The domain name registry for fashioncoachbag.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for fashioncoachbag.com is Bizcn.Com, Inc.

iiiii. Upon information and belief, the domain name handbags4coach.com is registered to Aai Hai, Putian, Putianshi, Fujian 351100, China, 1191090520@qq.com. The domain name registry for handbags4coach.com is

VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for handbags4coach.com is Hichina Zhicheng Technology Ltd.

jjjjj. Upon information and belief, the domain name coachoutlet-2011.net is registered to Hao Kan Tou, Fu Jian, Pu Tian Shi, BJ 100101, diandian101@gmail.com. The domain name registry for coachoutlet-2011.net is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for coachoutlet-2011.net is Xin Net Technology Corporation.

kkkkk. Upon information and belief, the domain name coachlvhandbags.com is registered to Yun Long Li, Fu Jian Sheng Xia Men Shi Si M,Fu Jian Sheng Xia Men Shi Si M, Xia Men Xia Men Shi, BJ, 352110, xinnames@gmail.com. The domain name registry for coachlvhandbags.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for coachlvhandbags.com is Hichina Zhicheng Technology Ltd.

lllll. Upon information and belief, the domain name coachonlineoutlet.us is registered to Icro Lin, Icro Trading Company, Silaki Kumu Fujian China, Fuzhoun Fujian 350000 China, icrosser@gmail.com. The domain name registry for coachonlineoutlet.us is Neustar, Inc., 21575 Ridgetop Circle, Sterling, Virginia 20166. The domain name registrar for coachonlineoutlet.us is Godaddy.com, Inc.

mmmmm. Upon information and belief, the domain name coach-online-outlets.com is registered to Liyanghua, Gu Shan Qu,Fuzhou Fujian 350000, China, 112252347@qq.com. The domain name registry for coach-online-outlets.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for coach-online-outlets.com is Bizcn.Com, Inc.

nnnnn. Upon information and belief, the domain name replicacoachoutlet.net is registered to top trade, putian, fujian, 351100, CN, needapairshoe@gmail.com. The domain name registry for replicacoachoutlet.net is VeriSign, Inc., 21345

Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for replicacoachoutlet.net is Network Solutions, LLC.

ooooo. Upon information and belief, the domain name coachhandbags-sale.com is registered to Qingtianwangluo, Putian Fujian 351100, qt@qtcn.net. The domain name registry for coachhandbags-sale.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for coachhandbags-sale.com is Xiamen Chinasource Internet Service.

ppppp. Upon information and belief, the domain name usacoachoutlets.com is registered to Weng Xiao Teng, Xiamenshihubinglull2hao, Xiamen Fujian 351111 China, tengteng50@yahoo.com.cn. The domain name registry for usacoachoutlets.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for usacoachoutlets.com is Bizcn.Com, Inc.

qqqqq. Upon information and belief, the domain name uscoachbag.com is registered to liu zhongqi, Fujian province, Xiamen City, Xiamen 361004, Fujian, China, liuzhongqi1976@163.com. The domain name registry for uscoachbag.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for uscoachbag.com is Beijing Innovative Linkage Technology Ltd. DBA Dns.Com.Cn.

rrrrr. Upon information and belief, the domain name us-coachoutlet.com is registered to sadf sdfsfdsfs, Fujian province, Xiamen City, Putian, Fujian 351111 China, yuansheng100@hotmail.com. The domain name registry for us-coachoutlet.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for us-coachoutlet.com is Hichina Zhicheng Technology Ltd.

sssss. Upon information and belief, the domain name us-coachpursesoutlet.com is registered to Ewrw Yuansheng, Fujian Province, Xiamen City, Putian, Fujian 351111 China, yuaqwwg1f00@hotmail.com. The domain name registry for us-coachpursesoutlet.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia

20166. The domain name registrar for us-coachpursesoutlet.com is Hichina Zhicheng Technology Ltd.

ttttt. Upon information and belief, the domain name pickcoachhandbags.com is registered to Lin Cheng, Fujianshen Putianshichengxiangqu, Putian, Fujian 351200, China, 928163303@qq.com. The domain name registry for pickcoachhandbags.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for pickcoachhandbags.com is Bizcn.Com, Inc.

uuuuu. Upon information and belief, the domain name coach-outlet-discount.com is registered to Hao Kan Tou, Fu Jian Sheng Pu Tian Shi, China 100101, diandian101@gmail.com. The domain name registry for coach-outlet-discount.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for coach-outlet-discount.com is Xin Net Technology Corporation.

vvvvv. Upon information and belief, the domain name coach222.com is registered to Chenzhiming, Fuzhou, Fujian 822121, China, chengjiaming163@163.com. The domain name registry for coach222.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for coach222.com is Jiangsu Bangning Science & Technology Co. Ltd.

wwwww. Upon information and belief, the domain name coachfactoryoutlet.net is registered to top trade, Putian, Fujian 351100 China, needapairshoe@gmail.com. The domain name registry for coachfactoryoutlet.net is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for coachfactoryoutlet.net is Network Solutions, LLC.

xxxxx. Upon information and belief, the domain name coachhandbags-sale.com is registered to coachhandbags-sale.com, putian fujian 351100, qt@qtcn.net. The domain name registry for coachhandbags-sale.com is VeriSign, Inc., 21345

Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for coachhandbags-sale.com is Xiamen Chinasource Internet Service.

16. The Hong Kong Group is defined and described as those infringing domain names whose registrants are, upon information and belief, the same individual or organization as evidenced by their use of fictitious addresses which all include some variation of the name “Hong Kong” in their postal address. While the majority of the registrant’s names and addresses are the same, upon information and belief, the listed registrants are fictitious based on the “return to sender” notices that Coach has received in response to its attempts to reach the listed registrants by postal mail. [*See* Cole Dec.] The Hong Kong Group’s interconnectedness is further evidenced not only by the similarities of the infringing domain names, and the appearance and composition of the sites (*compare, e.g.*, coachbags-shoppe.com, *with* coachhandbagsshoppe.com, *and* coachhandbags-usa.com), but also by the fact that either “Merry Liny” or “liny merry” is listed as the registrant of the majority of the infringing domain names. The Hong Kong Group is comprised of the following infringing domain names:

a. Upon information and belief, the domain name buycheapcoach.com is registered to Domain ID Shield Service, 1102-1103,11/F,Kowloon Bldg.,555 Nathan Rd.,Mongkok,Kowloon, Hong Kong CN, bu4047633195201@absolutee.com. The domain name registry for buycheapcoach.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for buycheapcoach.com is Onlinenic, Inc.

b. Upon information and belief, the domain name coach2handbags.com is registered to Xu Xian, 17 Tseuk Luk Street, San Po Kong, Kowloon, Hong Kong CN, webmaster@coach2handbags.net. The domain name registry for coach2handbags.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for coach2handbags.com is Xin Net Technology Corp.

c. Upon information and belief, the domain name coachbags-shoppe.com is registered to Merry Liny, Madole Street 101, Hong Kong 121212 China, merryt400@gmail.com. The domain name registry for coachbags-shoppe.com is

VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for coachbags-shoppe.com is Xin Net Technology Corporation.

d. Upon information and belief, the domain name coachhandbagsshoppe.com is registered to Merry Liny, Madole Street 101, Hong Kong 121212 China, merryt400@gmail.com. The domain name registry for coachhandbagsshoppe.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for coachhandbagsshoppe.com is Hichina Zhicheng Technology Ltd.

e. Upon information and belief, the domain name coachhandbags-usa.com is registered to Merry Liny, Madole Street 101, Hong Kong 121212 China, merryt400@gmail.com. The domain name registry for coachhandbags-usa.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for coachhandbags-usa.com is Hichina Zhicheng Technology Ltd.

f. Upon information and belief, the domain name coachoutlet-discount.net is registered to Merry Liny, Madole Street 101, Hong Kong 121212 China, merryt400@gmail.com. The domain name registry for coachoutlet-discount.net is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for coachoutlet-discount.net is Xin Net Technology Corporation.

g. Upon information and belief, the domain name coachoutlet2011.net is registered to Merry Liny, Madole Street 101, Hong Kong 121212 China, merryt400@gmail.com. The domain name registry for coachoutlet2011.net is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for coachoutlet2011.net is Xin Net Technology Corporation.

h. Upon information and belief, the domain name coachoutletdiscount.com is registered to Merry Liny, Madole Street 101, Jiulong, Hong Kong 121212, merryt400@gmail.com. The domain name registry for coachoutletdiscount.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for coachoutletdiscount.com is Xin Net Technology Corporation.

i. Upon information and belief, the domain name coachoutlet-discount.net is registered to Merry Liny, Madole Street 101, Jiulong, Hong Kong 121212, merryt400@gmail.com. The domain name registry for coachoutlet-discount.net is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for coachoutlet-discount.net is Xin Net Technology Corporation.

j. Upon information and belief, the domain name coachoutletshopping.com is registered to tm tradingcompany, 29901 ramsey road, Columbus, Georgia, USA, HONGKONG 210012, Carlosmoralales@gmail.com. The domain name registry for coachoutletshopping.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for coachoutletshopping.com is Jiangsu Bangning Science & Technology Co. Ltd.

k. Upon information and belief, the domain name coachoutlet-us.com is registered to Liny Merry, Madole Street 101, Madole, Hong Kong 121212, merryt400@gmail.com. The domain name registry for coachoutlet-us.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for coachoutlet-us.com is Hichina Zhicheng Technology Ltd.

l. Upon information and belief, the domain name coachoutlet-us.org is registered to Liny Merry, Madole Street 101, Hong Kong 121212 China, merryt400@gmail.com. The domain name registry for coachoutlet-us.org is Public Interest Registry, 1775 Wiehle Avenue, Suite 200, Reston, Virginia 20190. The domain name registrar for coachoutlet-us.org is Hichina Zhicheng Technology Limited.

m. Upon information and belief, the domain name thecoachoutlet.org is registered to outlet coach, 735811 outlet Road, East Lansing, MI, 49823, Hong Kong 1411 CN, 120312220@qq.com. The domain name registry for thecoachoutlet.org is Public Interest Registry, 1775 Wiehle Avenue, Suite 200, Reston, Virginia 20190. The domain name registrar for thecoachoutlet.org is currently unknown.

n. Upon information and belief, the domain name coach-sunglass.com is registered to Kenneth Lee, 102 Des Voeux Road Central, Central District, Hong Kong, Hong Kong 00000, wingleehong@gmail.com. The domain name registry for coach-sunglass.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for coach-sunglass.com is Godaddy.com, Inc.

17. The Zhengzhou Group is defined and described as those infringing domain names whose registrants are, upon information and belief, the same individual or organization as evidenced by their use of fictitious addresses which all include some variation of the name "Zhengzhou" in their postal address. Zhengzhou is the capital of the Henan province, which is located in north-central China, further suggesting that the "registrants" of these infringing domain names are related to one another. While the majority of the registrant's names and addresses are the same, upon information and belief, the listed registrants are fictitious based on the "return to sender" notices that Coach has received in response to its attempts to reach the listed registrants by postal mail. [S *See* Cole Dec.] The Zhengzhou Group's interconnectedness is further evidenced not only by the similarities of the infringing domain names, and the appearance and composition of the sites (*compare, e.g.,* icoachoutlet.net, *with* icoachoutlets.com, okcoachbags.com, *and* mycoachoutlets.com), but also by the fact that "Zhang" is listed as the registrant of a large number of the infringing domain names. The Zhengzhou Group is comprised of the following infringing domain names:

a. Upon information and belief, the domain name cheapcoachs.com is registered to Zhang Long, Zhengzhoushi Xichengzhuangzhongjie, Zhengzhou HA 450000 CN, zhanglong@gmail.com. The domain name registry for cheapcoachs.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for cheapcoachs.com is Hichina Zhicheng Technology Ltd.

b. Upon information and belief, the domain name coachbagspurse.com is registered to New Power, Ningbo, 315010 ZJ CN, 1078113988@qq.com. The domain name registry for coachbagspurse.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for coachbagspurse.com is Beijing Innovative Linkage Technology Ltd.DBA Dns.Com.Cn.

c. Upon information and belief, the domain name coachoutletlinebags.com is registered to Fang Tao, Fu Jian Fu Zhou 47, Zhengzhou HA 350007 China, fgghre4@yahoo.com.cn. The domain name registry for coachoutletlinebags.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for coachoutletlinebags.com is Hichina Zhicheng Technology Limited.

d. Upon information and belief, the domain name coachoutletsonlines.net is registered to Zhang Zhi, Shanghai Road, Zhengzhou, Henan 516666 China, zzzcxq@msn.com. The domain name registry for coachoutletsonlines.net is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for coachoutletsonlines.net is Xin Net Technology Corporation.

e. Upon information and belief, the domain name coach-purses.us is registered to li li, Jiefang Road, Jiefang Bui, Zhengzhou, Gua Gndong 525400 China, xueyoumei6876@rocketmail. The domain name registry for coach-purses.us is Neustar, Inc., 21575 Ridgetop Circle, Sterling, Virginia 20166. The domain name registrar for coach-purses.us is Melbourne It Ltd.

f. Upon information and belief, the domain name coachsoutlet-shop.com is registered to Zhang Zhi, Shanghai Road, Zhengzhou HA 516666 CN, zzzcxq@msn.com. The domain name registry for coachsoutlet-shop.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for coachsoutlet-shop.com is Hichina Zhicheng Technology Ltd.

g. Upon information and belief, the domain name coachsoutlets-online.com is registered to Zhang Zhi, Shanghai Road, Zhengzhou HA 516666 CN, zzzcxq@msn.com. The domain name registry for coachsoutlets-online.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for coachsoutlets-online.com is Xin Net Technology Corporation.

h. Upon information and belief, the domain name goodcoachbags.com is registered to Li Li, Zhengzhou, Guangdong 518000, goodcoachbags@yahoo.com. The domain name registry for goodcoachbags.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for goodcoachbags.com is Bizcn.Com.Inc.

i. Upon information and belief, the domain name icoachoutlet.net is registered to Zhang Zhi, Shanghai Road, ZhengZhou, Henan CN, zzzcxq@msn.com. The domain name registry for icoachoutlet.net is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for icoachoutlet.net is Xin Net Technology Corporation.

j. Upon information and belief, the domain name icoachoutlets.com is registered to Zhang Zhi, Shanghai Road, ZhengZhou, HA 516666, zzzcxq@msn.com. The domain name registry for icoachoutlets.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for icoachoutlets.com is Hichina Zhicheng Technology Ltd.

k. Upon information and belief, the domain name mycoachoutlets.com is registered to Fang Tao, Fu Jian Fu Zhou 47, Zhengzhou HA 350007, uewfn@yahoo.com.cn. The domain name registry for mycoachoutlets.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for mycoachoutlets.com is Hichina Zhicheng Technology Ltd.

l. Upon information and belief, the domain name offercoachbags.com is registered to Abduoul Devin, Zhengzhou, Henan Zhengzhou 510304 CN, tradenetok@gmail.com. The domain name registry for offercoachbags.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for offercoachbags.com is Hichina Zhicheng Technology Ltd.

m. Upon information and belief, the domain name okcoachbags.com is registered to Li Li, Zhengzhou, 518000 Guagndong China, okcoachbagscom@yahoo.com. The domain name registry for okcoachbags.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for okcoachbags.com is Melbourne It, Ltd. D/B/A Internet Names Worldwide.

n. Upon information and belief, the domain name coachoutletsonline.org is registered to Zhang Zhi, Shanghai Road, ZhengZhou, Henan, 516666, China, zzzcxq@msn.com. The domain name registry for coachoutletsonline.org is Public Interest Registry, 1775 Wiehle Avenue, Suite 200, Reston, Virginia 20190. The domain name registrar for coachoutletsonline.org is Xin Net Technology Corporation.

o. Upon information and belief, the domain name coach-handbag.org is registered to Jing He, Hejing, HeNanShengZhengzhouShiJinShuiQuBoSongLu68Hao1601Shi, Zhengzhoushi, Henan 4500002 China, 21813142@qq.com. The domain name registry for coach-handbag.org is Public Interest Registry, 1775 Wiehle Avenue, Suite 200, Reston, Virginia 20190. The domain name registrar for coach-handbag.org is Hichina Zhicheng Technology Limited.

p. Upon information and belief, the domain name uscoachpurses.com is registered to Fang Tao, Fu Jian Fu Zhou 47, Zhengzhou HA 35007, China, shelianan@hotmail.com. The domain name registry for uscoachpurses.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for uscoachpurses.com is Hichina Zhicheng Technology Ltd.

18. The Beijing Group is defined and described as those infringing domain names whose registrants are, upon information and belief, the same individual or organization as evidenced by their use of fictitious addresses which all include some variation of the name "Beijing" in their postal address. Although many of the registrant names are different, each listed address and/or registrant name is, upon information and belief, fictitious based on the "return to sender" notices that Coach has received in response to its attempts to reach the listed registrants by postal mail. [*See* Cole Dec.] The Beijing Group's interconnectedness is further evidenced by the similarities of the infringing domain names (*compare, e.g.*, coachhandbagshop.com, *with* coachhandbagcom.com, ladycoachbags.com, topcoachhandbags.com, coachbag-stores.com, *and* coachusabags.com). The Beijing Group is comprised of the following infringing domain names:

a. Upon information and belief, the domain name classic-coach.com is registered to Ka Bei Ni, Fu Jian Xia Men Shi Si Ming Q, Xia Men Xia Men Shi BJ 360001, 825943803@qq.com. The domain name registry for classic-coach.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for classic-coach.com is Xin Net Technology Corporation.

b. Upon information and belief, the domain name coach001.com is registered to Cheng Hong, Zhengzhoushi Jing San Lu, Beijing CN 450008, info@861.cn. The domain name registry for coach001.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for coach001.com is Xin Net Technology Corporation.

c. Upon information and belief, the domain name coachbag-stores.com is registered to Chen Yanbing, Beisihuandonglu, Chaoyang Beijing CN 100101, qpg_200505@126.com. The domain name registry for coachbag-stores.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for coachbag-stores.com is Hichina Zhicheng Technology Ltd.

d. Upon information and belief, the domain name coach-cheap.com is registered to Zhao Li, Beijing Chongwen East, BeiJing Beijing 201600, 5785423@qq.com. The domain name registry for coach-cheap.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for coach-cheap.com is Bizcn.Com, Inc.

e. Upon information and belief, the domain name coach-factory-outlets.org is registered to Han ChengGuo, 901 XiGuan Road, BeiJing, Beijing CN 350001, Hanchenggong9920@hotmail.com. The domain name registry for coach-factory-outlets.org is The Public Interest Registry, 1775 Wiehle Avenue, Suite 200, Reston, Virginia 20190. The domain name registrar for coach-factory-outlets.org is China Springboard Inc.

f. Upon information and belief, the domain name coach-factory-stores.net is registered to Ying Cheng, Beijing 100010 China, mogumogu@gmail.com. The domain name registry for coach-factory-stores.net is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for coach-factory-stores.net is Godaddy.com, Inc.

g. Upon information and belief, the domain name coachfashionshop.com is registered to Ying Cheng, Chaoyangqu Changandajie 33hao, Beijing, 100010, mogumogu@gmail.com. The domain name registry for coachfashionshop.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for coachfashionshop.com is Todaynic.Com, Inc.

h. Upon information and belief, the domain name coachonline-sale.com is registered to Chen Yanbing, Beisi Huan Donglu, Chaoyang, Beijing, 100101, China, qpg200505@126.com. The domain name registry for coachonline-sale.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for coachonline-sale.com is Hichina Zhicheng Technology, Inc.

i. Upon information and belief, the domain name coachoutlet100.com is registered to Wu Wuhua, Beijing Chaoyan, Beijing 12312, 123@123.com. The domain name registry for coachoutlet100.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for coachoutlet100.com is Beijing Innovative Linkage Technology Ltd. DBA Dns.Com.Cn.

j. Upon information and belief, the domain name coachoutletshoppe.org is registered to Merry Liny, Madole Street 101, Beijing 121212, China, chicken23@163.com. The domain name registry for coachoutletshoppe.org is VeriSign, Inc., The Public Interest Registry, 1775 Wiehle Avenue, Suite 200, Reston, Virginia 20190. The domain name registrar for coachoutletshoppe.org is Xin Net Technology Corporation.

k. Upon information and belief, the domain name coachoutletstores-usa.com is registered to Li Dongfang Group Co Limited, Wei Dong Li, 215 Xinghua Road Dongcheng, Beijing, China 100000, coachoutletstores-usa@hotmail.com. The domain name registry for coachoutletstores-usa.com is VeriSign, Inc., 21345

Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for coachoutletstores-usa.com is Xin Net Technology Corporation.

l. Upon information and belief, the domain name coachoutlet-vip.com is registered to Hao Kantou, Fu Jian Sheng, Pu Tian Shi BJ 100101, xiaozxin@hotmail.com. The domain name registry for coachoutlet-vip.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for coachoutlet-vip.com is Xin Net Technology Corporation.

m. Upon information and belief, the domain name coachsbags.com is registered to Beijing Harmony Softwae Co. Ltd, beijingshi haidianqu qinghuadaxue, xueyandasha B zuo508, China, merryt400@gmail.com. The domain name registry for coachsbags.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for coachsbags.com is Hang Zhou E-Business Services Co.Ltd.

n. Upon information and belief, the domain name coachsoutlet.com is registered to Wang Jian, Beijing Shi Haidianqu, Qinghuadaxue Xueyandasha B zuo508, Beijing, merryt400@gmail.com. The domain name registry for coachsoutlet.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for coachsoutlet.com is Host Canada, Inc.

o. Upon information and belief, the domain name coachusabags.com is registered to Xiao Liang, Beijingzhongguancunkejiyuan, Bejing, Hebei, China, 163changsang@gmail.com. The domain name registry for coachusabags.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for coachusabags.com is Xiamen Chinasource Internet Service Co. Ltd.

p. Upon information and belief, the domain name discountcoach-store.com is registered to Chen Yanbing, Beisihuandonglu, Chaoyang 100101 BJ CN, qpg_200505@126.com. The domain name registry for discountcoach-store.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for discountcoach-store.com is Beijing Innovative Linkage Technology Ltd.DBA Dns.Com.Cn.

q. Upon information and belief, the domain name officialcoachoutlet.com is registered to Yang Xiawen, Shou Ti Nan Lu 729hao, Bejing, BJ 100000 CN, admin@officialcoachoutlet.com. The domain name registry for officialcoachoutlet.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for officialcoachoutlet.com is Hichina Zhicheng Technology Ltd.

r. Upon information and belief, the domain name topcoachhandbags.com is registered to Jinhuan Zhang, Guang Dong Sheng Guang Zhou Sh, Guan, Guang Zhou Shi BJ 510000 CN, 284481968@qq.com. The domain name registry for topcoachhandbags.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for topcoachhandbags.com is Hichina Zhicheng Technology Ltd.

s. Upon information and belief, the domain name usa-coach-outlet.com is registered to Huang Feifei, Beijinchaoyanmen, Beijin, Beijing, China 351111, tengteng50@yahoo.com.cn. The domain name registry for usa-coach-outlet.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for usa-coach-outlet.com is Xin Net Technology Corporation.

t. Upon information and belief, the domain name usacoachoutletstore.com is registered to Zhang Daming, Beijing Jifewoll Fekks Q, Beijingshi, China 110001, youmei0@163.com. The domain name registry for usacoachoutletstore.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for usacoachoutletstore.com is Xin Net Technology Corporation.

u. Upon information and belief, the domain name coachoutletfactorys.com is registered to Stanley Ye, BJ Street No. 663, BJ BJ 350000, CN, stanley@zocytrade.com. The domain name registry for coachoutletfactorys.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for coachoutletfactorys.com is Jiangsu Bangning Science & Technology Co. Ltd.

v. Upon information and belief, the domain name ladycoachbags.com is registered to Kevin Hill, beijinglu kunming, - China, beyongkm@hotmail.com. The domain name registry for ladycoachbags.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for ladycoachbags.com is currently unknown.

w. Upon information and belief, the domain name coachsaleshops.com is registered to Ke Qu, Zhongguancun Road 778, Beijing 107895 China, kequ898989@163.com. The domain name registry for coachsaleshops.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for coachsaleshops.com is Beijing Innovative Linkage Technology Ltd. DBA Dns.Com.Cn.

x. Upon information and belief, the domain name coachoutletshoppe.com is registered to Merry Liny, Madole Street 101, Beijing 121212, China, chicken23@163.com. The domain name registry for coachoutletshoppe.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for coachoutletshoppe.com is Hichina Zhicheng Technology Ltd.

y. Upon information and belief, the domain name Wholesalecoachs.com is registered to Ke Qu, Zhongguancun Road 778, Beijing 107895 China, kequ898989@163.com. The domain name registry for Wholesalecoachs.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for Wholesalecoachs.com is Beijing Innovative Linkage Technology Ltd. DBA Dns.Com.Cn.

z. Upon information and belief, the domain name coachhandbagshop.com is registered to ices, Dev, Lize Road, Chaoyang District, Beijing, 1,beijing, beijing 100100, China, wellwade03@gmail.com. The domain name registry for coachhandbagshop.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia

20166. The domain name registrar for coachhandbagshop.com is Godaddy.com, Inc.

aa. Upon information and belief, the domain name coachhandbagcom.com is registered to zhang jinhua, Beijing 546325 China, augustusche@foxmail.com. The domain name registry for coachhandbagcom.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for coachhandbagcom.com is Bizcn.Com, Inc.

bb. Upon information and belief, the domain name 2coachoutlet.com is registered to Lin Jun, Damingxian, Taiyuan,Shandong,CN 210100, wawwnold@126.com. The domain name registry for 2coachoutlet.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for 2coachoutlet.com is 35 Technology Co., Ltd.

19. The 173916647@qq.com Group is defined and described as those infringing domain names whose registrants are, upon information and belief, the same individual or organization as evidenced by their use of the email address "173916647@qq.com," and/or logograms as their postal address. Although many of the registrant names appear to be different, each listed address and/or registrant name is, upon information and belief, fictitious based on the "return to sender" notices that Coach has received in response to its attempts to reach the listed registrants by postal mail. [*See* Cole Dec.] The 173916647@qq.com Group's interconnectedness is further evidenced by the similarities of the infringing domain names, and similarities in the appearance and composition of the sites (*compare, e.g.,* coachoutlet2.com, *with* ccoachoutlet.com, coachoutlethot.com, coachoutlet2.com, coachoutlet-outlet.com, *and* coachoutlets3.com). The 173916647@qq.com Group is comprised of the following infringing domain names:

a. Upon information and belief, the domain name ccoachoutlet.com is registered to 建民李建民, 太平区太平桥, 150051, 173916647@qq.com. The domain name registry for ccoachoutlet.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for ccoachoutlet.com is Xiamen Ename Network Technology Corporation.

b. Upon information and belief, the domain name cheapcoach-bags.com is registered to 李建民, 李建民, 太平区太平桥, 150051, 173916647@qq.com. The domain name registry for cheapcoach-bags.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for cheapcoach-bags.com is Xiamen Ename Network Technology Corporation.

c. Upon information and belief, the domain name coachbagsstore.net is registered to 李建民, 李建民, 太平区太平桥, 150051, 173916647@qq.com. The domain name registry for coachbagsstore.net is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for coachbagsstore.net is Xiamen Ename Network Technology Corporation.

d. Upon information and belief, the domain name coachoutlethot.com is registered to 173916647@qq.com. The domain name registry for coachoutlethot.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for coachoutlethot.com is Xiamen Ename Network Technology Corporation Limited DBA Ename Corp.

e. Upon information and belief, the domain name coachoutlet2.com is registered to 173916647@qq.com. The domain name registry for coachoutlet2.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for coachoutlet2.com is Xiamen Ename Network Technology Corporation Limited DBA Ename Corp.

f. Upon information and belief, the domain name coachoutletnews.com is registered to 173916647@qq.com. The domain name registry for coachoutletnews.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for coachoutletnews.com is Xiamen Ename Network Technology Corporation Limited DBA Ename Corp.

g. Upon information and belief, the domain name coachoutlet-outlet.com is registered to 173916647@qq.com. The domain name registry for coachoutlet-outlet.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for coachoutlet-outlet.com is Xiamen Ename Network Technology Corporation Limited DBA Ename Corp.

h. Upon information and belief, the domain name coachoutlets3.com is registered to 173916647@qq.com. The domain name registry for coachoutlets3.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for coachoutlets3.com is Xiamen Ename Network Technology Corporation Limited DBA Ename Corp.

i. Upon information and belief, the domain name coachoutletss.com is registered to 李建民, 李建民, 173916647@qq.com. The domain name registry for coachoutletss.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for coachoutletss.com is Xiamen Ename Network Technology Corporation Limited DBA Ename Corp.

20. The @123 Group is defined and described as those infringing domain names whose registrants are, upon information and belief, the same individual or organization as evidenced by their use of some variation of @123 in their registered email addresses. Although some of the registrant names are different, each listed address and/or registrant name is, upon information and belief, fictitious based on the "return to sender" notices that Coach has received in response to its attempts to reach the listed registrants by postal mail. [*See* Cole Dec.] The @123 Group's interconnectedness is further evidenced by the similarities of the infringing domain names, and the similarities in the appearance and composition of the sites (*compare, e.g.*, coach-outlet-vip.net, *with* coachoutletvip.com, *and* coachoutletvip.org.com). The @123 Group is comprised of the following infringing domain names:

a. Upon information and belief, the domain name coachoutletkey.com is registered to Lin Qingyuang, Asdasdas, Asd, 123123, China, 123@123.cn. The domain name registry for coachoutletkey.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for coachoutletkey.com is Beijing Innovative Linkage Technology Ltd. DBA Dns.Com.Cn.

b. Upon information and belief, the domain name coach-outlet-vip.net is registered to Liu Ai Qing, Asdasdas, Asd, 123123, China, 123@123.com. The domain name registry for coachoutletvip.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for coachoutletvip.com is Beijing Innovative Linkage Technology Ltd. DBA Dns.Com.Cn.

c. Upon information and belief, the domain name coachoutletvip.com is registered to liu Ai Qing, Asdasdas, Asd, 123123, China, 123@123.cn. The domain name registry for coachoutletvip.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for coachoutletvip.com is Beijing Innovative Linkage Technology Ltd. DBA dns.com.cn.

d. Upon information and belief, the domain name coachoutletvip.org is registered to coach outlet vip, Xining, QH, 125412, China, 123123@123.com. The domain name registry for coachoutletvip.org is Public Interest Registry, 1775 Wiehle Avenue, Suite 200, Reston, Virginia 20190. The domain name registrar for coachoutletvip.org is Beijing Innovative Linkage Technology Ltd. DBA Dns.Com.Cn.

e. Upon information and belief, the domain name handbag-coach.net is registered to Chen Ping, Nanchangjie506-8, Nanchang, Jiangxi 145623 China, 123@123.com. The domain name registry for handbag-coach.net is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for handbag-coach.net is Bizcn.Com, Inc.

21. The @qq.com Group is defined and described as those infringing domain names whose registrants are, upon information and belief, the same individual or organization as evidenced by their use of the email address "@qq.com" and/or logograms as their postal address. Although many of the registrant names appear to be different, each listed address and/or registrant name is, upon information and belief, fictitious based on the "return to sender" notices

that Coach has received in response to its attempts to reach the listed registrants by postal mail. [*See* Cole Dec.] The @qq.com Group's interconnectedness is further evidenced by the similarities of the infringing domain names, and the appearance and composition of the sites (*compare, e.g.,* cheapcoachbag.com, *with* cheapcoachbagssale.com, *and* cheapcoachbagssales.com). The @qq.com Group is comprised of the following infringing domain names:

a. Upon information and belief, the domain name cheapcoachbag.com is registered to zhijie zhao, Anhui CN 450000, 928415@qq.com. The domain name registry for cheapcoachbag.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for cheapcoachbag.com is Xin Net Technology Corporation.

b. Upon information and belief, the domain name cheapcoachbagssale.com is registered to Lidazhao, 525 Hercules Tri Madison, hengyang 421200 HN CN, 384046652@qq.com. The domain name registry for cheapcoachbagssale.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for cheapcoachbagssale.com is Beijing Innovative Linkage Technology Ltd.

c. Upon information and belief, the domain name cheapcoachbagssales.com is registered to 林建宇, 林建宇, 吉林省长春市南关区, 130041, 1554253616@qq.com. The domain name registry for cheapcoachbagssales.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for cheapcoachbagssales.com is Xiamen Ename Network Technology Corporation Limited.

d. Upon information and belief, the domain name coachbags1941.com is registered to Zhengliqun, Zheng Liqun, Wenxian, 351100, 1483558547@qq.com. The domain name registry for coachbags1941.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for coachbags1941.com is Xiamen Ename Network Technology Corporation.

e. Upon information and belief, the domain name coachbagsnew.com is registered to Zhengliqun, Wenxian, 351100, 1483558547@qq.com. The domain name registry for coachbagsnew.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for coachbagsnew.com is Xiamen Ename Network Technology Corporation.

f. Upon information and belief, the domain name coachhandbagshoppe.com is registered to liny merry, madole strret 101,madole strret 101, Liyuan Xiaoqu 351100 China, 172109625@qq.com. The domain name registry for coachhandbagshoppe.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for coachhandbagshoppe.com is Hichina Zhicheng Technology Ltd.

g. Upon information and belief, the domain name coachoutletpoppy.com is registered to Tangchao Trading Company, Second Around Shejian Road, Xiamen 351124, China, 107680011@qq.com. The domain name registry for coachoutletpoppy.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for coachoutletpoppy.com is Bizcn.Com, Inc.

h. Upon information and belief, the domain name coachoutletusa.net is registered to Tang Xiaojiang, Shangraoshiyuganxianshikouzhenchangshancun85hao, Jiangxi 334000 China, 1350313761@qq.com. The domain name registry for coachoutletusa.net is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for coachoutletusa.net is Bizcn.Com, Inc.

i. Upon information and belief, the domain name coachpursesforcheap.com is registered to Di Qiang, 45, Buxing Street, Wuwei City, Ganshu Provice, Henan, HE 361146, 5640651146@qq.com. The domain name registry for coachpursesforcheap.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for coachpursesforcheap.com is Xin Net Technology Corporation.

j. Upon information and belief, the domain name coachstoresale.com is registered to Liuqing Wu, Yang Bang Village Degree Wu tai 55 number, xian you xian 351100, 54981835@qq.com. The domain name registry for coachstoresale.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for coachstoresale.com is Xin Net Technology Corporation.

k. Upon information and belief, the domain name ecoachstore.com is registered to Zhang Wu, Gong Bu Tang Lu 1 Hao, La Sa Shi, XZ 890000, 838363507@qq.com. The domain name registry for ecoachstore.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for ecoachstore.com is Hichina Zhicheng Technology Ltd.

l. Upon information and belief, the domain name e-coachstore.com is registered to zhang wu, gong bu tang lu 1 hao, la sa shi, XZ 890000, 838363507@qq.com. The domain name registry for e-coachstore.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for e-coachstore.com is Hichina Zhicheng Technology Ltd.

m. Upon information and belief, the domain name goodcoachoutlet.com is registered to zhengshuang, wenminglu, Datong 350419 SX, 2301456@qq.com. The domain name registry for goodcoachoutlet.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for goodcoachoutlet.com is Beijing Innovative Linkage Technology Ltd.DBA Dns.Com.Cn.

n. Upon information and belief, the domain name top-coachhandbags.com is registered to Li Xin, Xinjiang 351160, 787487585@qq.com. The domain name registry for top-coachhandbags.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for top-coachhandbags.com is Bizcn.Com,Inc.

o. Upon information and belief, the domain name uscoachbagssale.com is registered to Tangchao Trading Company, Second Around Shejian Road, xiamen xiamen 351124, China, 107680011@qq.com. The domain name registry for uscoachbagssale.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for uscoachbagssale.com is Bizcn.Com, Inc.

p. Upon information and belief, the domain name coachoutlets2.com is registered to 1554253616@qq.com. The domain name registry for coachoutlets2.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for coachoutlets2.com is Xiamen Ename Network Technology Corporation Limited DBA Ename Corp.

q. Upon information and belief, the domain name ecoachshop.com is registered to 太平区太平桥, 150051, Gong Bu Tang Lu 1 Hao, La Sa Shi, 890000 China, 838363507@qq.com. The domain name registry for ecoachshop.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for ecoachshop.com is Hichina Zhicheng Technology Ltd.

r. Upon information and belief, the domain name uscoachfactory.com is registered to Lijianfan, Li Cheng Qu, 351100,537553944@qq.com. The domain name registry for uscoachfactory.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for uscoachfactory.com is Xiamen Ename Network Technology Corporation Limited DBA Ename Corp.

s. Upon information and belief, the domain name uscoachoutlets1941.com is registered to lijianfan, li cheng qu, 351100, 537553944@qq.com. The domain name registry for uscoachoutlets1941.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for uscoachoutlets1941.com is Xiamen Ename Network Technology Corporation Limited DBA Ename Corp.

t. Upon information and belief, the domain name coachbagsnews.com is registered to 1554253616@qq.com. The domain name registry for coachbagsnews.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for coachbagsnews.com is Xiamen Ename Network Technology Corporation Limited DBA Ename Corp.

u. Upon information and belief, the domain name coachbagss1941.com is registered to 1554253616@qq.com. The domain name registry for coachbagss1941.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for coachbagss1941.com is Xiamen Ename Network Technology Corporation Limited DBA Ename Corp.

v. Upon information and belief, the domain name coachfactoryoutlets.net is registered to Li Jianfan, Li Cheng, Qu 351100 China, 537553944@qq.com. The domain name registry for coachfactoryoutlets.net is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for coachfactoryoutlets.net is Xiamen Ename Network Technology Corporation Limited DBA Ename Corp.

w. Upon information and belief, the domain name coachhandbagsmart.com is registered to Zhengzhongqiang, Liyuan Xiaoqu 10dong 501#, 351100, 172109625@qq.com. The domain name registry for coachhandbagsmart.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for coachhandbagsmart.com is Xiamen Ename Network Technology Corporation.

x. Upon information and belief, the domain name coachhandbagsshop.com is registered to Zhengzhongqiang, Liyuan Xiaoqu 10dong 501#, 351100, 172109625@qq.com. The domain name registry for coachhandbagsshop.com is VeriSign, Inc., 21345 Ridgetop Circle, Dulles, Virginia 20166. The domain name registrar for coachhandbagsshop.com is Xiamen Ename Network Technology Corporation.

y. Upon information and belief, the domain name topcoachoutlet.org is registered to Da Diguo, Jian Sha Zui 368, Jian Sha Zui XJ 351247 CN, 1171900688@qq.com. The domain name registry for topcoachoutlet.org is Public Interest Registry, 1775 Wiehle Avenue, Suite 200, Reston, Virginia 20190. The domain name registrar for topcoachoutlet.org is currently unknown.

IV. FACTUAL BACKGROUND

22. Coach was founded seventy (70) years ago as a family-run workshop in Manhattan. Since then Coach has been engaged in the manufacture, marketing and sale of fine leather and mixed material products including handbags, wallets, accessories, eyewear, footwear, jewelry and watches. Coach sells its goods through its own specialty retail stores, department stores, catalogs, and via the Internet website www.coach.com throughout the United States, including Virginia.

23. Coach has used a variety of legally-protected trademarks, trade dress, and design elements and copyrights for many years on and in connection with the advertisement and sale of its products, including but not limited to, those detailed in this Complaint (collectively, the "Coach Marks").

24. Coach has expended substantial time, money, and other resources in developing, advertising, and otherwise promoting the Coach Marks. As a result, products bearing the Coach Marks are widely recognized and exclusively associated by consumers, the public, and the trade as being high quality products sourced from Coach, and have acquired strong secondary meaning. Coach products have also become among the most popular in the world, with Coach's annual global sales currently exceeding three billion dollars ($3,000,000,000).

25. Coach is the owner of a number of United States Federal Trademark Registrations (hereinafter collectively referred to as the "Coach Trademarks"). Attached hereto and incorporated herein as "Exhibit A" are true and correct details of these registrations.

26. The Coach Trademarks are valid, subsisting, in full force and effect and have become incontestable pursuant to 15 U.S.C. §1065.[2]

27. The Coach Trademarks are unique and distinctive when applied to the high quality leather and mixed material goods, handbags and related merchandise, and identify the merchandise as high-quality goods from Coach. The registration of these marks constitutes *prima facie* evidence of their validity, and conclusive evidence of Coach's exclusive right to use the Coach Trademarks in connection with the goods identified therein and other commercial goods.

---

[2] All registrations originally held in the name of Coach's predecessors, Sara Lee Corporation and Saramar Corporation, were assigned in full to Coach on or about October 2, 2000.

28. The Coach Trademarks qualify as famous marks, as that term is used in 15 U.S.C. § 1125 (c)(1), and have been continuously used and never been abandoned.

29. Coach products are widely accepted by the public and are enormously popular, as demonstrated by the billions of dollars in sales of Coach products each year.

V. DEFENDANTS' UNLAWFUL CONDUCT

30. The IDN Defendants have been and are currently being used with commercial websites that offer for sale and/or sell counterfeit and/or infringing merchandise to the general public that bear the Coach Trademarks ("Infringing Websites").

31. Upon information and belief, the registrants of the IDN Defendants have utilized the same method and process of creating the Infringing Websites to illegally offer for sale and/or sell counterfeit and/or infringing merchandise to the general public that bear the Coach Trademarks.

32. The Infringing Websites have all been purposefully designed to attract consumers and cause them to purchase unauthorized merchandise bearing Coach Trademarks and/or Coach Marks.

33. Upon information and belief, the registrants of the IDN Defendants have not responded to cease and desist letters served upon them, and continue with their wrongful and unlawful use of the IDN Defendants for purposes of selling counterfeit merchandise infringing the Coach Trademarks. Attached hereto and incorporated herein as "Exhibit B" are true and correct copies of the cease and desist letters sent to the registrants of the IDN Defendants.

COUNT I

(*In Rem* Injunctive Relief - 15 U.S.C. § 1125(d))

34. Coach hereby repeats and re-alleges the allegations set forth in paragraphs 1 through 262 above, as if fully set forth herein.

35. Coach's claim arises under the Anticybersquatting Consumer Protection Act, 15 U.S.C. § 1125(d), for cybersquatting by the IDN Defendants which wholly incorporate the Coach Trademarks.

36. Coach owns the exclusive rights to the Coach Trademarks listed on Exhibit A. The Coach Trademarks' registration remains in full force and effect. Additionally, the Coach

Trademarks qualify as famous pursuant to 15 U.S.C. § 1125©(1) and were famous prior to and at the time of registration of the IDN Defendants.

37. The IDN Defendants are each identical or confusingly similar to the Coach Trademarks.

38. The IDN Defendants have not been used and are currently not being used for any legitimate purpose. Instead, the IDN Defendants are being used to offer counterfeit Coach merchandise for sale through the websites to which the IDN Defendants control, operate or otherwise manage.

39. The IDN Defendants have been used and are currently used in bad faith in order to unlawfully and wrongfully profit from the Coach Trademarks and Coach's reputation.

40. Upon information and belief, the registrants of the IDN Defendants act in bad faith and harm the goodwill enjoyed by the Coach Trademarks by offering counterfeit Coach goods, diverting consumers from Coach's legitimate online website for the registrants' own commercial gain, and by registering one or more domain names that infringe upon the rights of Coach.

41. The IDN Defendants are identical, confusingly similar to, and dilutive of the famous Coach Trademarks.

42. Coach has satisfied the requirements of 15 U.S.C. § 1125(d)(2)(A)(ii)(II), and consequently, this *in rem* action over the IDN Defendants is proper and appropriate.

43. The registration and use of the IDN Defendants causes, and is likely to continue to cause, substantial and irreparable injury to the public and to Coach. Therefore, Coach is entitled to an order transferring the IDN Defendants to its possession, pursuant to 15 U.S.C. § 1125(d)(2)(D)(i).

PRAYER FOR RELIEF

WHEREFORE, the Plaintiffs, Coach, Inc. and Coach Services, Inc., hereby request the entry of an order by the Honorable Court granting the following relief:

1) The entry of temporary, preliminary and permanent injunctive relief against each of the IDN Defendants prohibiting each of the IDN Defendants from continuing to operate;

2) Requiring that VeriSign, Inc., the Public Interest Registry, and Neustar, Inc. change the registrar of the IDN Defendants to Coach's registrar, and to register the IDN Defendants in the name of Coach, Inc.; and,

3) Granting Coach such other and further relief as this Honorable Court deems just and fit.

Dated: July 1, 2011

Respectfully submitted,

BRYAN CAVE LLP

By: ____/s/_________________

P.J. Meitl (VA Bar ID 73215)
S. Patrick McKey (admitted *Pro Hac Vice*)
Donald A. Cole (admitted *Pro Hac Vice*)
BRYAN CAVE, LLP
1155 F Street, N.W.
Washington, D.C. 20004
Telephone: (202) 508-6000
Facsimile: (202) 508-6200
pj.meitl@bryancave.com